

the situation is similar, and diseconomies of small scale would accrue to the decentralized sites. Arguably, cost efficiencies are particularly stacked against small centers at night because there is not one night shift, but two.

The mathematical comparison of the independent model to the centralized model suggests that the centralized model will in general be cheaper.

Comparing TC_{indep} to TC_{hybrid} gives us the following equations:

$$TC_{indep} - TC_{hybrid} =$$

$$\left[\sum F_i - \left[\sum F_i + I \right] \right] + \left[\sum V_{di} C_{di} - \sum V_{di} C_{di} \right] + \left[\sum V_{ni} C_{ni} - V_{nc} \sum C_{ni} \right] = \\ -I + \left[\sum V_{ni} C_{ni} - V_{nc} \sum C_{ni} \right]$$

The first term in this expression for cost difference between TC_{indep} and TC_{hybrid} is unambiguously negative. That is, the fixed costs for the hybrid will be greater than the fixed costs for the independent model since I is positive. The daytime variable costs were the same for the independent and hybrid systems, so the daytime cost term cancels out. The nighttime costs would be lower for the hybrid system, for the economies-of-scale reasons discussed above. However, if there is a per-call cost to transfer calls from the subareas to the central location, then that cost would have to be added to V_{nc} .

If the fixed cost of setting up the hybrid system is greater than the nighttime staffing savings, then an independent system will have the lower cost. However, it is more likely that the incremental fixed costs of the hybrid system would be small compared to the savings to be had by consolidating the call volume at night. This would make the hybrid system the lower-cost option.

Now we compare the centralized versus hybrid approaches.

$$TC_{hybrid} - TC_{cent} =$$

$$\left[\left[\sum F_i + I \right] - F_c \right] - \left[\sum V_{di} C_{di} - V_{dc} \sum C_{di} \right] - \left[V_{nc} \sum C_{ni} - V_{nc} \sum C_{ni} \right]$$

The sign of the first term is not known for certain. However, earlier we argued that it would be cheaper to operate one big call center rather than N small ones. When the incremental fixed costs of hybridizing (I) are added to the independent model, the fixed-cost advantage of the centralized model becomes even greater.

The second term as in the in an earlier comparisons, leans in favor of the centralized model because of the economies of scale that manifest lower total cost for daytime calls.

The third term in this equation is zero because the night calls would be handled the same way in both the centralized and hybrid models.

Thus in the comparison of the centralized to the hybrid models, the centralized model will have both a lower fixed cost and a lower per-call cost during daylight hours, unless the subareas have a population large enough that the centralized approach has no economies of scale. In that case, the hybrid model will still have higher fixed costs, but the per-call costs will be about equal.

Pulling it all together, we have the following results:

1. The independent model is likely to be more costly than the centralized model
2. The independent model is likely to be more costly than the hybrid model
3. The hybrid model is likely to be more costly than the centralized model

If cost were the only consideration, then the centralized model would likely be the best alternative. However, there may be other considerations as important as cost. For example, if local control is a political issue, the independent model may be the only politically viable option. On the other hand if uniformity of service quality among the regions is important, then the centralized approach may be optimal.

Appendix G: Inter-site Comparability and other Issues

Researchers encountered an enormous amount of variability between sites. Variables include differences in organizational structure, fiscal management and accounting practices, database management, the use of technologies, staffing arrangement (including the use of volunteers), service delivery practices, scale of operations, funding sources, and other features. While the configurations of these features can be approached from the perspective of management and cost efficiencies, researchers examined them primarily in order to assure that all effort that contributed to the operations of the 2-1-1 I&R call center was identified and accounted for in expenditure reports, and secondarily to account for significant cost differences between sites. In the prior instance for example, if the call center was a unit in a larger organization, researchers sought to determine how indirect costs of centralized administration, support functions (e.g., marketing, information technologies), and overhead were allocated to the call center unit. The purchase of an automatic call distributor (ACD), computers, software, and workstations, if considered a one-time expense, is an example of the latter.

Alongside the detailed process analysis, fiscal (budget and expenditure) and service delivery (call and telephone) data provided by the sites had to be examined to assure that these reports and the data elements contained in them were comprehensive, accurate, appropriate for the analysis, and comparable between sites. This is necessary for developing a reliable national benefit/cost analysis, as well as equitable site specific benefit/cost estimates.

The more challenging areas for aligning data across sites include:

Call Volume Definition. Call volume in the study sites has been variously defined as a) an entry into the ACD; b) an answered phone; c) an answered phone with a human on the line; d) a transaction (at least one referral) entered into the call database; e) any referral(s). The definition affects many common measures such as call volume/population, cost per call, and call volume growth.

Phantom Call Management. A phantom or static call causes the phone to ring but there is no human point source. Reportedly it is a phenomenon caused by telephone switches and is sensitive to weather and distance. Most sites exclude phantom calls from their call volume. (Either “a” or “b” above may include phantom calls.)

After Hours Calls. Eight of the eleven sites have 24/7 service. Several take calls after hours for other sites. Those that do may or may not include these in their call volume.

Specialized/Other Toll Free Lines. Most sites have specialized or dedicated lines for specific services or programs (e.g., suicide/crisis hotline, Big Brothers/Big Sisters, CHIP or child care information.) These are generally excluded from call volume and budgeted separately.³⁸ Specialized services may also be provided through the 2-1-1 trunk and are counted in call volumes.

³⁸ Specialized lines and contracted services often support the more generalized, free services.

Data Continuity and Staff Capacity. Some sites are challenged to produce annualized pre/post 2-1-1 reports. Reasons offered include organizational merger, incompatible data systems/software, staff turnover, and staff time.³⁹

Call Volume Growth Rate. Different methods of calculating call volume are accompanied by the possibility of call center mergers, and expansion of the catchment area in determining call volume growth rate. Additionally, there could be rapid growth or spikes affecting the annual volume due to additional projects or events (e. g., natural disaster).

Call Volume/Population Ratio. Often referred to as the saturation or penetration rate, this measure is subject to the same limitations as call volume growth rate.

Researchers also made several other observations during the research:

Salaries. The review of expenditure data and conversations with administrators rapidly confirmed that salaries and benefits are by far the largest cost item for the 2-1-1 I&R Centers. Although sites have difficulty specifying actual implementation costs, they almost unanimously state that hiring additional staff to handle anticipated increase in call volume is a major cost factor.

Marketing. Marketing of 2-1-1 is an intensive, formal campaign with media exposure and advertisements in a couple of sites, but most prefer moderate to casual approaches such as outreach to health and human services organizations or target populations in the community. Brochures, pamphlets, and flyers, etc., serve these purposes. Marketing is generally limited because administrators fear overwhelming I&R specialists with requests and/or providers with referrals—both are related to resource constraints.

Information Technologies. As previously suggested, information technologies and the capacity to use them vary considerably across centers. The resource database is available to the public on-line in most sites, but at this time most individuals prefer to use the telephone. (Sites occasionally still produce print directories and the database is usually available on CD for those without internet access.)

Access. Limited cell phone access is a major issue across several sites. Pay phone access is increasingly questionable. Stronger public sector support with telephone company negotiations may open up access and stabilize telecommunications costs, which vary considerably.

Service Delivery. Service delivery intensity varies across sites and affects measures like average call time, number of calls per specialist, and call volume targets. Some sites will always “ask the second question,” believing that there is usually a complex of interconnected needs. Others will simply respond to the request at hand. Sites may adhere to performance measures rather strictly or use them more loosely as management monitoring tools.

³⁹ Sites with the same software and automated systems were in one instance unable to produce the same report, suggesting uneven capacity.

Volunteers. Call centers infrequently use volunteers to answer telephones, generally because of quality control and training issues—most volunteers are unlikely to commit enough time to justify the training investment.

Credentials. Education and training minimum requirements for hiring call specialist range from a high school diploma with some experience to college degrees. One site has a majority of I&R specialists with advanced degrees. Most sites strongly encourage and pay for AIRS certification for I&R specialists.

ATTACHMENT SEVEN

Trial by Wind and Water:

How 2-1-1 Played a Vital Role During the 2004 Florida Hurricanes



United Way • AIRS ★
2-1-1™
Get Connected. Get Answers.



Trial by Wind and Water:

How 2-1-1 Played a Vital Role During the 2004 Florida Hurricanes



United Way • AIRS ★
2-1-1™
Get Connected. Get Answers.







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Trial by Wind and Water: How 2-1-1 Played a Vital Role During the 2004 Florida Hurricanes

Executive Summary

In 2004, Florida became the first state in 130 years to be hit by five “tropical cyclones” in a single year—Tropical Storm Bonnie, Hurricane Charley, Hurricane Frances, Hurricane Ivan, and Hurricane Jeanne. For the first time, 2-1-1 centers across a state played a vital role throughout a major emergency—in the days leading up to each of the storms, during the storms themselves, in the immediate aftermath, and in the long-term recovery.

United Way of America commissioned this report to document the work done by the 2-1-1 centers, to offer the Florida 2-1-1 centers the opportunity to reflect on and learn from their experience, and to share their stories with 2-1-1 centers and emergency management staff throughout the country.

2-1-1 in Florida

2-1-1 is the three-digit telephone number designated by the Federal Communications Commission in 2000 as “an easy-to-remember and universally-recognizable number” to connect people with human and social services. There currently are twelve active 2-1-1 regional and local call centers that serve 33 of Florida’s 67 counties, providing 2-1-1 access to 75 percent of its population, and handling over 500,000 calls per year. There are nine additional comprehensive information & referral centers in the state, many of which have announced their intention to become 2-1-1 centers. The 2-1-1 centers come together in the Florida 2-1-1 Network, a cooperative effort of the Florida Alliance of Information and Referral Services (FLAIRS) and the United Way of Florida.

While 2-1-1 is available to 75 percent of Florida’s population, it is not accessible in half of the state’s 67 counties. The lack of statewide coverage limited the extent to which 2-1-1 could serve the state during the emergency—there could not be a coordinated state-level decision to establish 2-1-1 as the dialing code to be used throughout the state to reach disaster response services. Until 2-1-1 becomes a truly statewide system, it is unlikely that it will be fully recognized as a partner in emergency management and, thus, continue to be ineligible for the funding from FEMA and other sources required for it to make the maximum possible contribution during an emergency.

The Value of 2-1-1

During the Emergency, 2-1-1 made seven primary contributions:

- expanded the capacity of Emergency Operations Centers (EOCs) by providing trained information and referral specialists and by offering the public an alternative access point for information;
- managed information about availability of services and the status of health and human service organizations and government agencies;
- identified unmet and emerging needs, helping direct resources to high priority places;
- provided critically needed telephone reassurance and crisis support for callers;
- helped mobilize and manage volunteers and cash and in-kind donations;
- served as intake points on behalf of government agencies and nonprofit organizations, increasing the efficiency of connecting people with needed help; and,
- offered a sustained connection to help for people whose lives were dramatically affected by the storm as 2-1-1 became part of long-term recovery efforts.

Lessons Learned

1. 2-1-1 centers conclusively demonstrated the significant contribution that they can make in an emergency.
2. 2-1-1 centers need to clarify the roles they want to play during an emergency, to build relationships in advance to enable those roles, and to be very flexible and innovative.
3. 2-1-1 centers must build strong relationships with partners who will support them and who are in a position to respond to the data 2-1-1 is collecting—with key response organizations like the Salvation Army and American Red Cross, with United Way and Volunteer Centers, and with government and nonprofit service providers.
4. Emergency management does not intuitively understand the potential value add of 2-1-1 to its work, suggesting the need for 2-1-1 to engage in significant education, advocacy, and relationship-building with emergency management at all levels—national, state, and local.
5. 2-1-1 centers must prepare for a new kind of operation during an emergency with the emphasis on advance preparation, flexibility and innovation to respond to sustained spikes in call volume, rapidly changing information that is hard to collect but which must be managed and disseminated, and breakdowns in planned staffing and existing emergency plans.
6. “Telephone reassurance” is an essential role for 2-1-1 to play in all phases of an emergency.
7. The emergency reinforced the importance of developing 2-1-1 as a system at the local, state, and national levels to ensure the highest sustained level of performance and to secure the funds required to enable 2-1-1 to respond to emergencies and the new needs that come with them.

Volume and Nature of Calls

The volume of calls was so great that it proved impossible for 2-1-1 centers to track them accurately. Estimates ranged from 60,000 calls in six days in Lee County to a 300 percent increase in Orlando to increases of 25-40 percent at other 2-1-1 centers.

The nature of the calls received changed rapidly as communities moved from one phase of the storm to the next:

- Pre-storm—information about evacuation, location and availability of shelters, inquiries from people with special needs, preparation for the storm
- During the storm—reassurance, crisis intervention, emergency assistance
- Immediate aftermath—location of essential services (water, ice, food), rescue needs, debris removal, power outages
- Recovery—disaster relief financial assistance, property damage, disaster-caused health issues, disaster-related transportation issues

The Partnership with United Ways

The state-level partnership between 2-1-1 and United Ways existed well before the storms. FLAIRS and United Way of Florida joined together to develop the strategic business plan for the Florida 2-1-1 Network; worked together to pass the state legislation authorizing development of 2-1-1; and now are jointly seeking funding from the legislature to make statewide access to 2-1-1 a reality.

During the Emergency, the partnership served both parties well. By working together, 2-1-1 and United Ways expanded each other’s capacity to serve their community and enabled both to build stronger relationships with EOCs and with other nonprofit organizations.

For 2-1-1 centers, the partnership directly connected them to the significant community leadership roles undertaken by United Ways statewide, leveraging the value of 2-1-1’s data, focusing greater attention on their contribution, and bringing them new resources. For United Ways, the partnership with 2-1-1 better positioned them to be at the heart of the emergency response effort and gave them new opportunities to demonstrate community impact.



Introduction

Hurricane / Typhoon: A tropical cyclone in which the maximum sustained surface wind (using the U.S. 1-minute average) is 64 kt (74 mph or 119 km/hr) or more. The term hurricane is used for Northern Hemisphere tropical cyclones east of the International Dateline to the Greenwich Meridian. The term typhoon is used for Pacific tropical cyclones north of the Equator west of the International Dateline.

Hurricane Season: The portion of the year having a relatively high incidence of hurricanes. The hurricane season in the Atlantic, Caribbean, and Gulf of Mexico runs from June 1 to November 30.²

On July 29, 2004, a “tropical wave” crossed Dakar, Senegal and moved westward for several days, accompanied by cloudiness, thunderstorms, and “a well-defined cyclonic rotation at the mid-levels.” Less than a week later, a tropical depression grew out of the system as it passed Barbados. Within another week, it had become Tropical Storm Bonnie near the northeastern tip of the Yucatan Peninsula. It made landfall near Saint Vincent and Saint George Islands just south of Apalachicola, Florida mid-morning on August 12.³

The 2004 hurricane season had begun for the more than 17 million residents of Florida.

By the time the last winds and rains of Hurricane Jeanne had subsided on September 27, 48 days after Bonnie’s landfall, 110 people in the United States and over 1,600 people in the Caribbean were dead and an estimated \$60 billion in damages had been incurred.

For the first time in 130 years, a single state had been hit by five “tropical cyclones” in a single year—Tropical Storm Bonnie, Hurricane Charley, Hurricane Frances, Hurricane Ivan, and Hurricane Jeanne.⁴

Preparations for and recovery after the storms generated a massive response on the part of federal, state, county, and municipal emergency management agencies, nonprofit organizations, faith-based groups, and businesses, and by individual citizens not only throughout Florida but from around the United States who volunteered their time and made cash and in-kind contributions.

For the first time, 2-1-1s across a state were able to play a vital role throughout the emergency—in the days leading up to each of the storms, during the storms themselves, in the immediate aftermath, and in the long-term recovery. This is the story of what they experienced, how they performed, and what they learned from their experience.

¹ As quoted from Inwards, Richard, 1898: *Weather Lore*. Elliot Stock, London, p. 86 by Edward N. Rappaport and Jose Fernandez-Partagas in “The Deadliest Atlantic Tropical Cyclones, 1492-1996”, NOAA Technical Memorandum NWS NHC 47, May 28, 1995, which may be found at <http://www.nhc.noaa.gov/pastdeadly.shtml?>

² op. cit., Rappaport and Fernandez-Partagas.

³ “Tropical Storm Bonnie: 3-13 August 2004” by Lixion A. Avila of the National Hurricane Center, October 5, 2004. <http://www.nhc.noaa.gov/>

⁴ “As hurricane season ends, Floridians wonder what’s in store for the future” by Ken Kaye, posted November 28, 2004 on <http://www.sun-sentinel.com/>.

June too soon.
July stand by.
August look out you must.
September remember.
October all over.

—Mariner’s poem¹



About This Study

Trial by Wind and Water: How 2-1-1 Played a Vital Role During the 2004 Florida Hurricanes was commissioned by United Way of America:

- to document the work of 2-1-1s and other comprehensive I&Rs in Florida during the 2004 hurricane emergency;
- to gain perspective on the contribution that the 2-1-1s and I&Rs made to the overall organized community response to that emergency;
- to offer the 2-1-1s and I&Rs the opportunity to reflect on and learn from their experience; and,
- to share what they experienced and learned with 2-1-1s, United Ways, and emergency management agencies of government nationwide.

The research included:

- site visits to five of the hardest-hit counties—Lee, Charlotte, Brevard, Orange, and Palm Beach;
- face-to-face and telephone interviews with 77 people;
- review of internal and public reports provided by the 2-1-1s, news reports, and web sites; and,
- a meeting of 21 people from 2-1-1s and other comprehensive I&Rs organized by the Florida Association of Information and Referral Services (FLAIRS) and the United Way of Florida.

This report is organized into five chapters:

- The first **establishes the context** for understanding the emergency and the role of 2-1-1s. It describes the status of 2-1-1s in Florida, identifies three major variables affecting the role the 2-1-1 played, explores the limitations of the 2-1-1s and the implication for the contribution they could make, and discusses the volume and the nature of calls received by 2-1-1s during the emergency.
- The second describes **lessons learned** from this experience. These lessons are valuable not only for the Florida 2-1-1s as they examine how they will respond to future hurricanes and other natural disasters, but also to 2-1-1s in communities throughout the United States as they prepare to meet a wide variety of natural disasters.
- The third describes **the contributions of 2-1-1**—expanding the capacity of emergency response, managing information, identifying unmet needs, reassuring callers, mobilizing and managing volunteers, serving as intake for service providers, and sustaining the connection. It is here that their stories are told, both in their own words and in the words of those who worked with and observed them.
- The fourth discusses **the value of partnerships**—with emergency management agencies of government, with United Ways, with Volunteer Centers, and with one another.
- The fifth presents three **operational issues** of interest—the value and limitations of advance planning; issues around whether, when and how to close during an emergency; and, concerns about how best to support 2-1-1 staff and volunteers who work through an emergency.

There also are a number of sidebars throughout the report devoted to specific examples. A complete list of people interviewed and footnotes will be found at the very end.

There are four terms that recur throughout the report:

- **“2-1-1”** has been defined to include those comprehensive I&Rs currently operating with the 211 3-digit dialing code, those who are actively preparing to become 2-1-1s, and those who are exploring the possibility of becoming 2-1-1s.
- **“the Emergency”** is the term chosen to refer to the total experience. It began, as noted above, in early August 2004. For those most affected by the storm, it has yet to end. For some 2-1-1s, the term refers to the immediate period around a single storm; for others, the entire period.
- **“EOC,”** which technically means “Emergency Operations Center,” the facility that houses county government’s emergency management team during an emergency, is used as an umbrella term to refer to that entire effort. Thus, “the relationship between 2-1-1 and the EOC” refers to the relationship with whatever the specific emergency management structure is within the county or municipality.
- **Hurricanes** and tropical storms are referred to by the name given them by the World Meteorological Organization—Bonnie, Charley, Frances, Ivan, and Jeanne.

About 2-1-1

Information & referral services are specifically designed to connect people with the health and human services they need, usually through telephone interaction with a trained referral specialist. Comprehensive I&Rs deal with the broadest range of callers’ requests. Specialized I&Rs may focus either on a specific population group (seniors, youth, etc.) or with a specific issue area (substance abuse, HIV-AIDS, crisis counseling, etc.). Some I&Rs “blend” comprehensive I&R services with crisis intervention.

2-1-1 is the 3-digit telephone number designated by the FCC in July 2000 as “an easy-to-remember and universally-recognizable number that would enable a critical connection between individuals and families in need and the appropriate community-based organizations and government agencies.”

By the fall of 2004, 139 2-1-1 systems had begun operating in 28 states and the District of Columbia, allowing over 34% of the U.S. population, more than 100 million people, to gain access to information about the social services they need by dialing 2-1-1.



Chapter One

Establishing the Context

This chapter provides the context to understand the experience of the 2-1-1s during the Emergency. The chapter describes the current status of 2-1-1 in Florida, identifies three major variables affecting the role the 2-1-1s played, explores the limitations on the 2-1-1s and the implication for the contribution they could make, and discusses the volume and the nature of calls received by the 2-1-1s during the emergency.

2-1-1 in Florida

There currently are twelve active 2-1-1 regional and local call centers that serve 33 of Florida's 67 counties, providing 2-1-1 access to 75% of its population and handling over 500,000 calls per year. There are nine additional comprehensive I&Rs in the state, many of which have announced their intention to become 2-1-1s.

The 2-1-1s come together in the Florida 2-1-1 Network, a cooperative effort of the Florida Alliance of Information and Referral Services (FLAIRS) and the United Way of Florida. In 2002, the Florida state legislature adopted Florida Senate Bill 1276 which authorized "the planning, development, and...implementation of a statewide Florida 211 Network which shall serve as the single point of coordination for information and referral for health and human services." By specifically naming FLAIRS, the statewide association of local information and referral providers, the legislature recognized the strength of the state's existing 2-1-1 assets.

In 2003, FLAIRS and United Way of Florida joined together in a strategic planning process that resulted in a strategic business plan to guide the development of the Network, to achieve statewide coverage and to build strong collaboration with the public sector. It described their vision of

...an integrated, efficient statewide system of local and regional call centers that will work together to provide telephone access to trained referral specialists 24 hours a day, 365 days a year—providing the right information in the right way at the right time.

The business plan foresaw the role of 2-1-1 in response to natural disasters:

We must be prepared to respond immediately and effectively to the reality of natural disasters. We know better than any other state the devastating impact of natural disasters. Not only do they create immediate emergency situations that require intensive first response but also have long-term consequences for victims, increasing the need for access to health, human services, and other support for full recovery....By building the statewide 2-1-1 network and collaborating on emergency planning, we can ensure that 2-1-1 remains available to all people in Florida during emergencies by re-routing calls to 2-1-1 call centers outside the immediate area of a disaster.

The Storms

Tropical Storm Bonnie made landfall near Saint Vincent and Saint George Islands just south of Apalachicola, Florida—in the Florida panhandle, 75 miles southwest of Tallahassee—as a tropical storm on August 12. Its winds were confined to coastal sections to the east of the center. As a depression, Bonnie continued to move northeastward, across the eastern United States, dissipating south of Cape Cod two days later. Although no damage or casualties were recorded in Florida, a tornado spawned by the storm killed three people in Pender County, North Carolina.⁵

Hurricane Charley struck Jamaica, the Cayman Islands, and western Cuba before making landfall just before 8:00 p.m. on August 13 on the southwest coast of Florida just north of Captiva, as a Category 4 hurricane, the strongest to hit the U.S. since Andrew in 1992. An hour later, the eye passed over Punta Gorda and “the eyewall struck that city and neighboring Port Charlotte with devastating results. Continuing north-northeastward at a slightly faster forward speed, the hurricane traversed the central Florida peninsula, resulting in a swath of destruction across the state.” It moved off the northeast coast, near Daytona Beach, around 3:30 AM on August 14, less than eight hours after its landfall. Charley was directly responsible for nine deaths in Florida and indirectly responsible for another 18. Total damages from the storm are estimated at \$15 billion.⁶

Hurricane Frances was an extremely slow-moving Category 2 hurricane that battered the east coast of Florida, between Fort Pierce and West Palm Beach, for most of Saturday, September 4 before coming ashore around 11:00 PM. It took another two hours for its 80 mile-wide eye to be fully over the state. It took almost 24 hours from the time of landfall for it to exit near Tampa as a tropical storm. As a tropical depression, its heavy rains continued to cause flooding as far north as the Canadian border. Frances was responsible for 20 deaths and approximately \$16 billion in damages.⁷

Hurricane Ivan “was a classical long-lived Cape Verde hurricane that made two landfalls along the U.S. coast and reached Category 5 strength three times.” It did extensive damage throughout its journey across the Caribbean Ocean from Granada to the tip of western Cuba. It spent three days moving northwest over the Gulf of Mexico before making landfall southwest of Pensacola. Ivan was responsible for 52 deaths in the U.S and 70 in the Caribbean and an estimated \$20 billion in damages.⁸

Hurricane Jeanne caused over 3,000 deaths in Haiti from torrential rainfall flooding before making landfall in the United States eight days later east of Stuart, Florida on September 26. It moved across central Florida, moving north into Georgia almost 30 hours later. Jeanne was responsible for 11 deaths in the United States and 1,531 in the Caribbean and an estimated \$12 billion in damages.⁹

This sense of collaboration was not new with the business plan. Indeed, Florida had long had, in FLAIRS, a strong statewide association of both comprehensive and specialized I&Rs.

Variables Affecting the Role of 2-1-1 in the Emergency

The experience of the various 2-1-1s in Florida during the Emergency was highly situational, based on three key variables:

- *The nature of the 2-1-1 itself.* Some 2-1-1s are independent non-profit organizations; some are operating departments within a United Way; one is a unit of county government (Charlotte County); one is a combination 2-1-1 and Volunteer Center (Tampa Bay Cares). Many are blended services—that is, they offer both comprehensive I&R and crisis intervention services—but some are only I&Rs. Of those 2-1-1s that are independent organizations, some have close, sustained partnerships in place with their local United Way; others do not. Some have built relationships with those responsible for emergency management and disaster response in their counties; others have not. Each of these differences helped influence the nature of the role and extent of responsibility of each 2-1-1. They are not cookie-cutter replicas of one another; they are distinct entities with varying levels of capacity and expertise.
- *The extent of damage from the storms.* While it is true that virtually every county in Florida was affected by one or more of the storms, the nature of the impact varied widely, sometimes even within the service

⁵ Avila, op. cit.

⁶ “Hurricane Charley: 9-14 August, 2004” by Richard J. Pasch, Daniel P. Brown, and Eric S. Blake of the National Hurricane Center, October 18, 2004. <http://www.nhc.noaa.gov/>

⁷ “Hurricane Frances”. Wikipedia: The Free Encyclopedia. http://en.wikipedia.org/wiki/Hurricane_Frances

⁸ “Hurricane Ivan”. Wikipedia: The Free Encyclopedia. http://en.wikipedia.org/wiki/Hurricane_Ivan

⁹ “Hurricane Jeanne: 13-28 September, 2004” by Miles B. Lawrence and Hugh D. Cobb of the National Hurricane Center, November 22, 2004. <http://www.nhc.noaa.gov/>

area of an individual 2-1-1. Some of the 2-1-1s accurately described their county as “devastated;” others spoke of receiving “glancing blows of 100 MPH winds and gales of rain;” others were affected very little. Those in the most severely damaged areas had greater demands placed on them and more opportunities to provide a broader range of service to the community.

- *The phase of the storm.* There were at least four distinct phases of the storms that 2-1-1s identified—pre-storm, during the storm, the immediate aftermath, and the long-term recovery. Some 2-1-1s played active roles in all four. Others were limited by circumstance, relationships, or lack of resources to being active only in the post-storm phases.

In short, there is no “typical 2-1-1,” no “typical storm,” and no “typical experience.” In and of itself, this is an important lesson to learn from the Florida experience. When the 2-1-1s met together at the debriefing organized by FLAIRS, one of the key points made by the group was that the nature of the disaster will determine the nature of the response needed and the roles that 2-1-1s can play.

Limitations and Lost Opportunities

While 2-1-1 is available to 75% of Florida’s population, it is not accessible in half of the state’s 67 counties. This lack of statewide coverage limited the extent to which 2-1-1 could serve the state during the Emergency in two ways.

First, it meant that there could not be a coordinated state-level decision to establish 2-1-1 as the dialing code to be used throughout the state to reach disaster response services. One of the valuable attributes of 2-1-1 is that it is an easy-to-remember phone number. In Charlotte County, one of the hardest hit in the state, the 2-1-1 dialing code had not yet been adopted by the county’s Human Services

Department which provides comprehensive I&R services. Kelly Studenwall, Assistant Director of the department compared their situation with that of neighboring Lee County. She said, “Our EOC number was hard for people to remember. In Lee County, it was ‘dial 2-1-1.’ Which is easier?”

Because of the size of media markets and the division of EOCs by county, there were areas of the state where multiple 10-digit phone numbers were publicized for citizens to reach storm hotlines, citizen response centers, and rumor control centers. Had there been both statewide access to 2-1-1 and adequate advance planning, it would have been possible for the Governor to announce a single number—2-1-1—that anyone in the state could call to get the information and connection to services that they needed.

Second, until 2-1-1 becomes a truly statewide system, it is unlikely that it will be fully recognized as a partner in emergency management and, thus, continue to be ineligible for the funding from FEMA and other sources required for it to make the maximum possible contribution during an emergency.

The need for statewide coverage was recognized in the state business plan as one of the greatest challenges facing the Network. Now, in reaction to the role 2-1-1 played during the Emergency, Florida’s United Ways and FLAIRS are, according to Ted Granger, President of the United Way of Florida, “moving forward together to expand 2-1-1 to the entire state. Because funding is a major barrier to achieving statewide coverage, and because state government and Florida residents receive such benefits from 2-1-1, the 2005 Florida Legislature will be asked to provide funding to support statewide implementation; an appropriation that, among others, will position the State as a full partner with United Ways, county and municipal governments, and others in supporting this community resource.”

The Volume of Calls

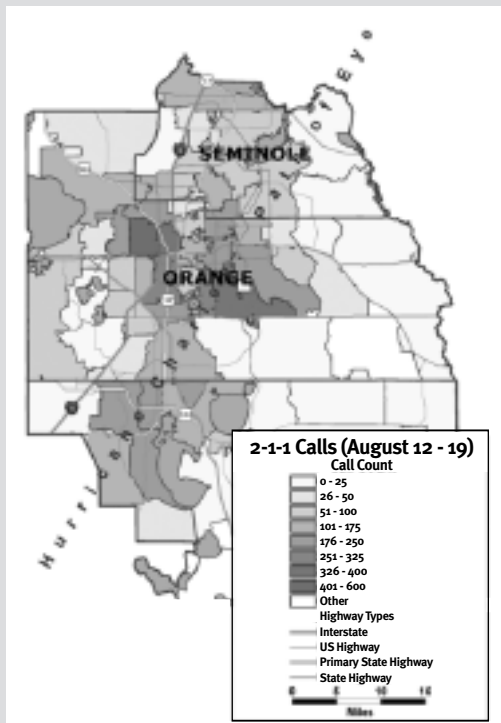
The truth is that no one will ever know how many calls the 2-1-1s in Florida received in the 48 days from beginning to end of the storms. Nor perhaps does it matter. As one I&R specialist put it, “The phone never stopped ringing. Every time you looked at the phone, all the lights were lit up. As soon as I hung up, the phone rang again.”

Libby Donoghue, Executive Director of 2-1-1 Brevard, in her report to her board about the storms, noted that an upgrade of computer systems disabled the call tracking software. Consequently, “staff and volunteers were asked to record calls handled with hash marks on a sheet designed for storm responses. The call volume was so high that this proved difficult, if not impossible to do accurately. [The charts in the report] represent the number of calls logged, estimated to represent as little as one third of actual numbers in the days immediately following [Hurricane Frances].”

Mapping the Orlando Calls

2-1-1 Community Resources in Orlando did one of the most extensive job reporting on the calls, including mapping call distribution by Zip code, allowing for an immediate visual representation of the origin of calls. For example:

The 2-1-1 organization uses mapping techniques to compare the origin of calls for specific needs against the location of available community resources. A classic example of this would be to plot calls for emergency food assistance against locations of existing food pantries.



Here is the best information available about call volume in some of the hardest hit areas:

- In Lee County, population 450,000, the United Way 2-1-1, working from the county Emergency Operation Center, estimated that they handled 60,000 calls in the first six days, including 900 per hour at the height of Hurricane Charley.
- In Charlotte County, the I&R division of the county's Department of Human Services, which is slated to become a 2-1-1, estimated that it handled 16,000 calls from their county's 142,000 residents as well as from concerned family members and potential volunteers and donors nationwide.
- 211 HelpLine in Palm Beach County actually counted 9,389 calls during September from Palm Beach County, an increase of 26% over the same month the previous year, and 2,435 calls from the four counties of the Treasure Coast, as many as in the entire third quarter of 2003.
- 2-1-1 Community Resources in Orlando, which serves the three counties of Orange, Osceola, and Seminole with a combined population of 1.5 million, took 19,551 calls between August 12 and September 20—a 300% increase over their normal call volume. [See box, “Mapping the Orlando Calls”, for more detail.]
- 2-1-1 Brevard (county population of 480,000) had a 41% increase in calls immediately after Hurricane Charley, including many from people wanting to know how to assist people in parts of the state with the most severe damage. In the three days prior to Hurricane Frances, they counted 3,650 handled calls [see the caveat above], 62% more than they handled in the entire month of August. They logged over 25,000 calls in September. Libby Donoghue reported, “The actual number of calls handled is estimated to be about 20% higher. Even the recorded volume is $6\frac{1}{2}$ times the number of calls taken in September of 2003, as well as 12% more than the total number of calls handled in FY2003.”

From counties less hard hit:

- 2-1-1 First Call for Help of Broward in Ft. Lauderdale reported a 10% increase in call volume.
- 2-1-1 Big Bend in Tallahassee did not see a significant increase in call volume because of the lack of serious damage in their service area.
- For First Call for Help of the United Way of Volusia and Flagler Counties in Daytona Beach, not yet a 2-1-1, there was a 20% increase in normal call volume in the week after Hurricane Charley.

The Nature of the Calls

The nature of the calls received changed rapidly as communities moved from one phase of the storm to the next:

- Pre-storm—information or advice about evacuation, location and availability of shelters, inquiries from people with special needs, preparation for the storm
- During the storm—reassurance, crisis intervention, emergency assistance
- Immediate aftermath—location of essential services (water, ice, food), rescue needs, debris removal, power outages
- Recovery—disaster relief financial assistance, property damage, disaster-caused health issues, disaster-related transportation issues

The common denominator throughout the phases was the clear need that callers had for reassurance.

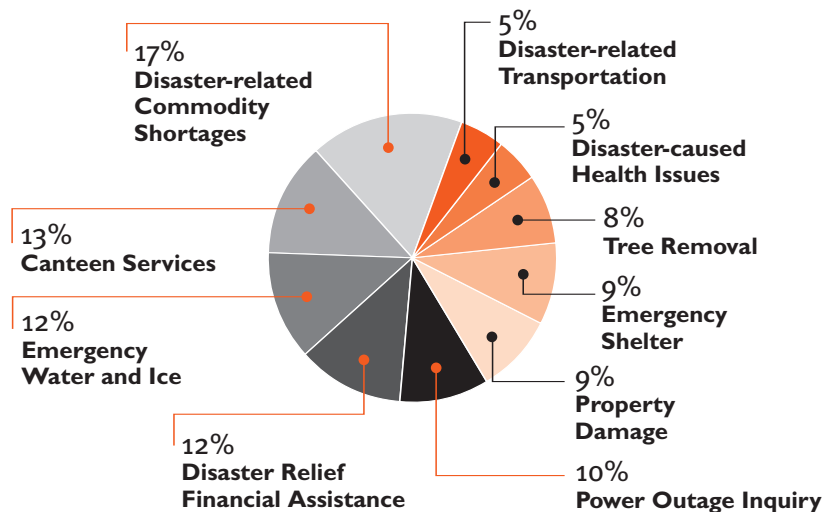
Call Type	Count
Disaster-related Commodity Shortages	710
Canteen Services	485
Emergency Water and Ice	450
Disaster Relief Financial Assistance	445
Power Outage Inquiry	392
Property Damage	334
Emergency Shelter	331
Tree Removal	326
Disaster-caused Health Issues	208
Disaster-related Transportation	177
TOTAL	3,858

The experience in Lee County, where the United Way 2-1-1 worked from the county's Emergency Operations Center, was very representative. Linda Pankow, manager of the 2-1-1, described the progression this way:

- “For the two days prior to Charley the calls were do I need to evacuate, what supplies do I need, where can I get them? People wanted to hear a live voice even if it was saying the same thing that was on the TV news.”
- “The day the storm hit, we got panicky calls about how to protect themselves since they could no longer leave.”
- “The day after the storm, the calls were where to get ice and water. We got information from stores on whether they were open. And we could send people to agencies close to them that were getting supplies from distribution centers. We were getting calls about power outages and by the second day we were getting updates from Florida Power and Light. We were getting calls about the curfew, about whether people could return to their homes.”
- “Now [six weeks later] we are getting calls from people who have lost their jobs because of the storms.”

The report of 2-1-1 Community Resources in Orlando for the week of August 12-19 is a good illustration of the nature of disaster-related calls.

Disaster-Related Calls in Orlando From August 12 through 19





Chapter Two

Lessons Learned

The purpose of this chapter is to look across the data collected during the research and to draw conclusions that may inform not only the future work of the 2-1-1s in Florida but also of 2-1-1s across the country and of those with whom they must partner during an emergency.

1. 2-1-1s conclusively demonstrated the significant contribution that they can make in an emergency—expanding the capacity of emergency response, managing information, spotting unmet needs, reassuring callers, mobilizing and managing volunteers, serving as intake for service providers, and sustaining the connection. This contribution was recognized by those with whom they worked—emergency management, public sector service providers, other nonprofits, and funders. As described in depth in Chapter Three, 2-1-1s’ work earned them a new level of respect in their communities and, hopefully, a “place at the table” as preparations are made for the next emergency.

2. 2-1-1s need clarity on the roles they want to play during an emergency, need to plan and build relationships in advance to enable that role, and prepare to be very flexible and innovative in what they actually do.

Clarity of role. There are a wide variety of roles that 2-1-1s can play during an emergency, from providing supplementary staffing for government emergency call centers to proactively putting call data to work in directing attention to gaps in service. They can be an integral part of government’s response to an emergency or they can stand outside, modifying their regular work to complement the government’s activities. They can help to mobilize volunteers—or not. They can serve as intake mechanisms for service providers—or not. All are legitimate choices. In Florida, no single 2-1-1 seemed prepared or positioned to do it all. In many cases, they determined their actions and role as they went along, responding to the circumstances and opportunities, not driven by advance planning. Ideally, 2-1-1s will answer the “what do we want to be?” question well in advance and will have taken the steps necessary to position and enable themselves to play that role, whatever it may be. Equally important, they will have considered what they do not want to do.

Advance planning. It is essential that 2-1-1s develop strong emergency management plans, test them with knowledgeable partners, rehearse them with those partners, and practice them internally. They must also recognize the limits of planning. As discussed in Chapter Five, the entire experience of an emergency is one extended learning process. The most carefully developed plans may not stand up in the rapidly changing reality of an emergency when the behavior of others becomes much less predictable than advance planning had anticipated.

Flexibility and innovation. Linda Pankow, Manager of the United Way 2-1-1 in Lee County, captured it when she said, “Don’t be disappointed if you don’t have everything right. You need to figure out what is needed every day.” Throughout the stories of how the 2-1-1s responded to the Emergency are examples of innovation—from finding new ways to organize and share rapidly changing information to creating new partnerships to help get volunteers to the places they were needed to seeing patterns in calls that revealed gaps in services.

Innovation was possible because the innovators could step outside the bounds of their everyday experience, putting what they knew to work in new ways. Libby Donoghue, executive director of 2-1-1 Brevard, understood that it takes mental preparation to innovate: “Be prepared in your mind to be flexible and creative.” Then, take the new ideas that grow from that creativity and turn them into action, into innovation.

3. It is essential that 2-1-1s build strong relationships with partners who are prepared to support them and who are in a position to respond to the data 2-1-1 is collecting.

After a 2-1-1 has clarity about the roles it wants to play and has developed its advance plans, it must turn attention to developing the relationships it needs to enable it to succeed. The most important of these clearly is with the emergency management structure in their service area. But there are more that must be cultivated and formalized—with key response organizations like the Salvation Army and American Red Cross, with the United Way and Volunteer Center and with both government and nonprofit service providers.

Where 2-1-1 seemed to make the greatest contribution in Florida, it appeared that these relationships were the strongest and had been purposely built. But even in those places, it was clear that some of the relationships were more ad hoc than others, that they were the result of working together over time and not because there had been purposeful planning to work together in an emergency.

Building a strong, mutually beneficial partnership with United Way is essential. This is not to say that every 2-1-1 should be merged into a United Way. Rather, it is to recognize that when they worked closely together, 2-1-1s and United Ways strengthened one another’s ability to play a significant role in responding to the emergency - and that was to the clear benefit of their communities. Such a partnership is a natural part of the growing United Way commitment to “community impact.”

A key aspect of relationship-building is to secure the funding to enable 2-1-1s to be full participants in emergency response. All of the 2-1-1s in Florida incurred some additional costs as a result of expanded work during the Emergency, primarily from the need to pay for additional staffing beyond that normally scheduled. While these were not large costs in the great scheme of things—perhaps in the range of \$5,000 to \$10,000 each—most 2-1-1s are not resource-rich and do not have significant discretionary funds. It was clear that for several of the 2-1-1s, their financial limitations also limited their work during the Emergency. With adequate advance relationship-building, 2-1-1 can be positioned as one of the primary emergency responders and thus able to share in funding that may become available from federal or state governments, as well as be recognized by local funders as “essential organizations” to receive emergency funding.

Libby Donoghue, executive director of 2-1-1 Brevard, spoke for all of the 2-1-1s when she said, “2-1-1s **must** be funded adequately to be able to respond. The partnerships are critical, but the expectations of the partners can’t exceed the capacity of the 2-1-1s.”

4. Emergency management does not intuitively understand the potential value add of 2-1-1 to its work.

It is relatively easy to develop a strong rationale for 2-1-1—indeed, the proliferation of 2-1-1s throughout the United States demonstrates that. That rationale typically includes the role

that 2-1-1s can play in response to an emergency or disaster or as part of “homeland security.” Too often, however, that case is built in a vacuum, without adequate consultation with emergency management or first responders. Thus, it remains more hypothetical than real, an assertion rather than a conclusion reached in concert with the customers for that role.

While it may be difficult for those who are champions for 2-1-1 to admit, not everyone automatically “gets it.” Scott Badesch, Chief Professional Officer of the United Way of Palm Beach County, had a realistic view when he observed, “People didn’t see the benefit of 2-1-1 until they needed it.”

In Florida, the EOC in Lee County clearly “got it” long before the hurricane season. As a result, the United Way 2-1-1 there was an integral part of the county’s emergency response and, because of that, the United Way came to the table in a new way and played a significant leadership role in the community, one that previously had not been available to them. In some of the other counties, the EOCs “got it” to the extent that they had made some provisions for the involvement of 2-1-1—but those provisions too often were not enough to allow the 2-1-1 to make the contribution that they were capable of. In addition, in some counties, there was little recognition prior to the Emergency of the value 2-1-1 could add. Fortunately, as Scott Badesch also observed, “...during this emergency they [2-1-1s] proved that they could respond. They were there every minute of the day for us.”

One possibility was expressed by Don Lusk, Assistant County Manager in Brevard County, that “information and referral” should be mandated as one of the core emergency management functions that need to be fulfilled, thus giving it legitimacy, a seat at the table, and the resources it needs to be done effectively.

To accomplish achieve this status will require 2-1-1s to engage in significant education, advocacy, and relationship-building with those responsible for emergency management. 2-1-1s must engage emergency management officials at all levels—national, state, and local. 2-1-1s

should build their case on as much data as possible, including that presented in this report, about how 2-1-1s have contributed in emergency situations. Emergency management officials need to be understood as customers of 2-1-1, with a concomitant understanding of those customers’ needs, priorities, and realities.

The relationship with emergency management is the one that will define the roles 2-1-1 will play during an emergency. It is the one that must receive the highest priority attention.

5. 2-1-1s must prepare for a new kind of operation during an emergency.

Everything changes in an emergency. There may be a huge and sustained spike in call volume, perhaps overwhelming established procedures for tracking the volume and nature of the calls. Existing databases may be essentially worthless, particularly during and in the immediate aftermath of an emergency. The information required will be hard to get and will be changing rapidly. Even EOCs may not have adequate information management procedures in place. Regular facilities may no longer be safe to occupy. Power may be lost for extended periods. Volunteers and paid staff may be unable or even unwilling to come to work. 2-1-1s must be prepared, through playing through “what if” scenarios, learning from those who have been through emergencies, and advance planning, to operate in new ways during an emergency.

6. “Telephone reassurance” is an essential role for 2-1-1 to play in all phases of an emergency.

The distinct phases in a hurricane emergency offer different roles for 2-1-1s. The role that cut across all of the phases in Florida, however, was the high demand for “telephone reassurance.” As discussed in the next chapter, anxiety and the need for reassurance was perhaps the defining characteristic of the vast majority of calls received by 2-1-1s immediately prior to, during, and immediately after the storms.

Responding to this need was one of the most important ways that 2-1-1s demonstrated their value to EOCs, which, by their own admission, were not prepared or staffed to handle such

calls. 2-1-1s brought a level of skill, trained telephone specialists, and experience that allowed EOCs to divert both crisis calls and reassurance calls to the 2-1-1 staff, thus providing better customer service while freeing up other EOC staff to do the work they were trained to do.

This suggests that 2-1-1s need to be prepared to perform this role, ensuring that paid staff and volunteers are trained to provide reassurance to callers—and, if necessary, being prepared to give sufficient on-the-job training for phone answerers who may have been recruited at the last moment.

7. The Emergency reinforced the importance of developing 2-1-1 as a system.

One of the first issues raised in the AIRS 2-1-1 Toolkit is whether the goal is to plan an I&R “system” with 2-1-1 in the lead role or to deliver a call center service. The preferred answer, of course, is to build a system. At the local level that means defining “2-1-1” as including specialized I&Rs, service providers, emergency management, and other stakeholders. At the state level, it means finding ways for 2-1-1s to work together effectively and, as a group, to build a broader system that includes those other stakeholders. At the national level, it ultimately will mean finding ways to enable 2-1-1s to work together across borders, to move calls if needed, and to share and aggregate data.

The experience in Florida reinforced the potential value of such systems:

- At the local level, 2-1-1s seemed to make greater sustained contributions where there were well-established partnerships and a history of working in concert.
- At the state level, the existence of a strong, established I&R state association plus the shared intent to build a true statewide 2-1-1 system set the stage for ongoing information-sharing, back-up support, learning, and support among the 2-1-1s as well as facilitating their collective engagement with other networks.
- At the national level, there was initial evidence that data gathered from 2-1-1s can be fed through other national systems to help deploy resources in local communities, that calls can be successfully forwarded to and handled by 2-1-1s at a distance, and that, if the contact information is available, 2-1-1s outside the affected area can direct callers to 2-1-1s in the affected areas to seek information on family members or to determine whether and when to return to the area.

Looking to the Future

How, then, can 2-1-1s in Florida give even greater benefit to the state in future hurricane emergencies? Consider these possibilities:

- If there is 100% statewide coverage by 2-1-1s, it will be possible for the state to adopt 2-1-1 as the phone number to be used during an emergency to reach EOCs—a single number that can be promoted statewide as the single access point to information.
- If all 2-1-1s are prepared to collect and map call data, it will be possible to construct a picture of emerging needs and gaps in services.
- If all 2-1-1s are adequately funded and are integrated into emergency response plans, they will be able to take an even greater burden off of first responders and front-line disaster relief organizations, freeing them to do their work and leveraging the skills of trained 2-1-1 specialists to provide better service to the public.
- If there is a strong, consistent statewide partnership between 2-1-1s and Volunteer Centers, 2-1-1s can serve as the intake mechanism for people who want to volunteer, freeing the Volunteer Centers to deploy and manage volunteers.
- If their expertise in information management is recognized, 2-1-1s can take on the task of collecting, organizing, and disseminating information about the availability of health and human services during and after an emergency.



- If 2-1-1s work out procedures for sharing resource information that are acceptable to all of them—whether through an integrated statewide database, efficient networking of databases through the Internet, or creation of a shared database specifically designed to handle rapidly changing emergency information—they will be better able to support one another, front-line responders, and service providers.
- If the 2-1-1s build a strong statewide network, they will be better positioned to command a “place at the table” at the state level and thus eligible for emergency funding from state and federal governments.

In the strategic business plan for the Florida 2-1-1 Network, FLAIRS and the United Way of Florida declared their intention to build a statewide *system* that could achieve these results:

- People will be better able to manage their own lives successfully because they have been provided with the information and tools they require to find and make decisions about accessing the support they need.
- Service providers will have an expanded statewide resource to help them better serve their consumers.
- Policy makers and resource allocators, both public and private, will have more complete information about trends in demand for services and early awareness of emerging needs.
- Public officials will be assured that their constituents are better able to get connected with the services they need in cost-effective and responsive ways that make best use of scarce resources.

The work of the 2-1-1s during the hurricane emergency of 2004 made it clear that such an ambition can be made real, particularly with the support of public sector leaders committed to giving the people of Florida the best possible access to the information they need to manage their lives.

The response of the Florida 2-1-1s to the Emergency confirmed that the people who build and manage state and local 2-1-1 systems are among the “best and brightest” of the nonprofit community. They understand the potential power of 2-1-1 to bring greater efficiency to human service delivery systems, to the benefit of both consumers and providers. They are deeply committed to performing with the highest possible quality. Perhaps most important, they believe in the absolute importance of connecting people who are on the margins of their communities with the information they need to take greater control over their own lives and futures. The leadership, commitment, and skills they bring to play are critical to a community’s ability to cope with an emergency.



Chapter Three

The Contribution of 2-1-1

Brevard 2-1-1 took calls during the extended time Hurricane Frances was passing through from people who had not evacuated, including one from a woman who was huddled with her nine-year old daughter in a closet. Another came from a woman, caring for her bi-polar husband, whose roof had blown off and whose house had a foot of water in it.

In Palm Beach County, 2-1-1 received some calls from people seeking guidance on whether to leave the area or not and asking their help in convincing others to evacuate. In one case, they brought a translator on to the call to help them communicate with a non-English speaking woman who did not want to leave her home.

On the fourth day after Frances hit Charlotte County, the I&R staff there received a call from a man in Montana. He had been watching a television report about the storm and saw his father in the background, walking around and looking confused. The I&R specialist who took the call notified the city police who went out and found the father. The I&R specialist then called the son to let him know where his father was.

In Orange County, 2-1-1 staff were able to identify a need for food in an area of Osceola County that had not been reached by the disaster response teams. As a result, the Heart of Florida United Way stepped in to provide canteen services for over 1,000 people.

For the seven weeks from the first warnings of Tropical Storm Bonnie until the last winds of Hurricane Jeanne and in the weeks that followed, 2-1-1s conclusively demonstrated the value they can add to emergency management and disaster relief. While some of the stories are as dramatic as those above, many are about making sure people knew to which shelter they should go during the evacuation, helping people find emergency rations of water and ice, connecting people with debris removal and roof repair services.

Even more of the stories are about how 2-1-1s resumed their normal role of connecting people with the services they need but in the new context of lives dramatically altered by the storms. As Randy Nicklaus, executive director of 2-1-1 Big Bend in Tallahassee, noted, the calls are from people who “had lost the structure of their lives and didn’t know what to do about it.”

“That bank of phones was an extremely important area of the EOC immediately following the storm. Many people needed to hear a voice at the other end. It was amazing that they were trained call-takers, trained to listen and to hear not only what’s being said but what’s not being said. The stress level for them was unbelievable, the same as for 911 operators. They went above and beyond.”

Dale Phillips, Office of the Sheriff, Charlotte County

Answering several hundred thousand telephone calls, 2-1-1s' trained information and referral specialists provided timely information, connected people with services they needed, provided telephone reassurance and handled crisis calls.

During the Emergency, 2-1-1 made seven primary contributions:

- **expanded the capacity** of Emergency Operations Centers (EOCs) by providing trained information and referral specialists and by offering the public an alternative access point for information;
- provided critically needed **management of information** about availability of services and the status of health and human service organizations and government agencies;
- **identified unmet and emerging needs**, helping direct resources to high priority places;
- provided critically needed **telephone reassurance and crisis support** for callers, complementing the work of the EOCs;
- helped **mobilize and manage volunteers** and cash and in-kind donations;
- served **as intake points** on behalf of government agencies and nonprofit organizations, increasing the efficiency of connecting people with needed help; and,
- offered **a sustained connection to help** for people whose lives were dramatically affected by the storm as they became part of long-term recovery efforts.

This chapter explores these contributions in greater depth, using the stories told by the 2-1-1s themselves and by people who observed their work to underscore the value they added to the overall response to the Emergency.

Expanding Capacity

Although the specifics varied widely from community to community, almost without exception the 2-1-1s expanded the capacity of Emergency Operations Centers (EOCs) by providing trained information and referral specialists and by offering the public an alternative and easy-to-remember access point for information. The extent to which 2-1-1 was able to fulfill that role, however, depended on the nature of their relationship with county government, the degree of advance planning, and the operational capacity of both partners.

Don Lusk, Assistant County Manager in Brevard County, perhaps gave the best summary when he said, "It was absolutely beneficial to have 2-1-1. Without it, it would have been a lot more difficult for our citizens. But we need to have a recognized, official 2-1-1 function within emergency preparation and management plans. 2-1-1 needs to be officially designated as a major player so they have the possibility of being funded the way they should be."

The relationship between 2-1-1 and emergency management is critical in determining the roles 2-1-1 can play. Looking at the experience in a number of different communities is an excellent way to see how that relationship played out and also to understand how the 2-1-1s operated during the Emergency.

Lee County

The United Way 2-1-1 went live in mid-August, 2003. By April, 2004, they had a contract in place with the EOC in Lee County, the largest of the three counties they serve with some 450,000 people. The contract built on an existing MOU with 911 that established protocols to transfer calls between the two services. There were two primary tasks 2-1-1 was to perform: providing support for people with special needs and recruiting and managing volunteers to maintain the county's storm hotline.

2-1-1 committed to place two trained I&R staff in the EOC and to provide 20 trained volunteers. The recruitment of volunteers was to have been done by the local Volunteer Resource Center, but when they were not successful, 2-1-1 did their own recruitment via their network of serv-

ice providers and through their newsletter. Two trainings were done in advance of the hurricane season, one for 10-12 volunteers and one for United Way staff.

Linda Pankow describes how events actually unfolded: “The reality was that we started manning the hotline on August 11 [two days before Hurricane Charley hit them]. We used four of the volunteers we had trained. We couldn’t reach many of those we had recruited. We also used United Way staff. On August 14, we put out a press release asking for volunteers for the hotline and got a good response. We tried to do

“We estimated that 2-1-1 got 60,000 calls that normally would have gone to 911, freeing those operators to handle emergency calls.”

Matt Recommier, 911 Coordinator for Lee County

some screening and provided 10-15 minutes of on-the-job training. We had at least fifty people involved with probably a dozen core volunteers. People really felt they made a difference, even though it was organized chaos.”The original idea was to lay 2-1-1 on top of the county’s operation as the primary access number but there had not been time to test it. So both 2-1-1 and the county’s hotline number were promoted. Although the 2-1-1 normally contracts with a crisis line to provide after-hours coverage, all calls received during the hurricane emergency were forwarded to the Sheriff’s office and handled there by the 2-1-1 team.

Matt Recommier, 911 Coordinator at the Sheriff’s office, was responsible for managing the relationship with 2-1-1. He explains, “The idea was to take the load off of 911. We knew how to set up the hotline but the question was how to staff it. We never realized how well [the partnership with 2-1-1] would work out for both sides. We got trained call takers who knew how to deal with people and a core staff who were being paid to be there. It worked out excellently for us.

“We have never had a storm hit this county with both its front end and back end. It was so severe that we kept the hotline open for a week. We couldn’t have done it with county employees. United Way 2-1-1 really stuck with it.

“It was good to have 2-1-1 here with us. We could provide generator back-up, computers, internet access, food and it is the place where information flows in to.”

Charlotte County

In Charlotte County, I&R services are provided by the county’s Department of Human Services.

Since 2002, the same office has provided the Elder Helpline for seven surrounding counties. Although they are close to becoming 2-1-1, one affect of the storms has been a delay due to uncertainty about the county budget.

According to Joy Duperault, supervisor of I&R services, “We had been pushing EOC to build a relationship and to prepare together but they had always been too busy to meet. A few days before the storm [Hurricane Charley], I contacted them again. As a result, two of our staff went to the EOC the morning the storm hit [Friday, August 13]. Over the weekend, the EOC used volunteers but it was difficult because their homes had been affected and they needed to take care of themselves. So they invited us to come back on Monday. We worked 8 AM to 8 PM that Monday through Friday and then 8-5 for another weekend and full week. We took our entire staff.

“We also had volunteers, including county government employees and people from other communities. We did twenty minutes of crash training for the volunteers. Without some training, they will feel they aren’t being helpful to callers.”

Based on their experience, it is clear to her that “2-1-1 needs a continuous relationship with both emergency management and 911. We need to know each other. There needs to be a framework that doesn’t fall apart or fade away. Neither one can do it effectively without the other one. 2-1-1 can’t do it on its own because it



can't get the information it needs. EOC needs 2-1-1 to become phone staff for them during an emergency."

Dale Phillips who normally runs prevention programs for the Sheriff's office was on duty at the EOC for four days, spending much of her time conveying messages from the phone bank to the agencies that were in the best position to respond to the need. She is very convinced of the value that Joy and her staff brought to the EOC. She says:

They were phenomenal. They are true "call-takers," the first line of information. They were there faithfully for hours on end.

The first three days were largely emergency calls, ranging from out-of-town family members looking for loved ones to residents needing info on food, water, where to go for help, etc. The I&R staff handled it all so professionally, with compassion and sensitivity.

The initial information needed to come in accurately for us to be able to help. Having them here alleviated the pressure on me. They didn't need my guidance. Joy ran her operation.

If I was assigned to prepare a first point of contact, a phone information unit in the event of a crisis, my first call would be to Joy and her team. In my opinion, a trained team of call-takers is the first and many times one of the most important lines of communication immediately following a crisis.

Brevard County

Libby Donoghue, executive director of 2-1-1 Brevard explains that "when 2-1-1 was being planned, we had meetings with county government about emergency situations. Our director of emergency management, Bob Lusk, saw the potential value of 2-1-1 from the outset."

In 2001, during the anthrax scare, the county Department of Health publicized 2-1-1 as the place to call for information. That resulted in over 500 calls, "the only test we had of using 2-1-1 for emergencies."

2-1-1 took different approaches for each of the storms. Because Hurricane Charley originally was not expected to hit Brevard County, the EOC initially did not indicate that they planned to activate. As a result, 2-1-1 developed their own contingency plans, closing their office and forwarding calls to a staff person's home. When the EOC did decide to activate, 2-1-1 then was unable to provide support because their staff was too dispersed and travel was discouraged.

For Frances, they followed their original plan which was for 2-1-1 to help out at the EOC and to transfer the 2-1-1 phone lines there. Unfortunately, that resulted in the forwarding of "phantom calls" with no way to screen them out. (2-1-1 usually uses an auto attendant in which callers must push the number four to talk to a live operator.)

2-1-1 had a corner of the EOC with six of their lines transferred in and at least two lines provided by the county. Both the county's emergency number and 2-1-1 was publicized. Because work conditions were far from ideal, Libby says, "As soon as we confirmed that we could do it, we hustled home to work."

The difficult reality, says Rob Rains, President of the United Way of Brevard County, is that "2-1-1 doesn't have adequate resources to step in and handle such an increased workload. We have to work on clarifying what additional resources can be committed during an emergency to expand capacity."

That is why, as quoted above, Assistant County Manager Don Lusk argues that "2-1-1 needs to be officially designated as a major player so they have the possibility of being funded they way they should be."

Palm Beach County

According to Susan Buza, executive director of 2-1-1 HelpLine serving Palm Beach County and the four counties of the Treasure Coast, her staff had worked hard to develop a relationship with the Palm Beach County EOC, primarily at the middle management level, and had developed a good proposed plan, including moving their 2-1-1 operations to the EOC and trying out their staff on the EOC phones. The partnership was to

begin in 2004 by relocating a few 2-1-1 staff to the EOC in event of a hurricane emergency. However, the agreement was not finalized, due largely to concerns raised by upper management of the EOC. As a result, Susan made the decision to close 2-1-1 during the storm because their building is not hurricane-safe. Because of loss of power, they ended up closed for three days.

Scott Badesch, Chief Professional Officer, of the United Way of Palm Beach County, was concerned that 2-1-1 would not be available so intervened with county government to secure space in the EOC for 2-1-1 to operate. Limitations on the phone lines there, however, meant that 2-1-1 calls were forwarded to only two lines, severely limiting the number of calls they could take and having callers consistently experience a busy signal.

From the perspective of Paul Milleli, Director of Public Safety for Palm Beach County, 2-1-1 was a pre-storm and post-storm resource. Before the storm, he says, “anyone could handle the calls because it’s all in the book [resource notebook] and they could transfer tough calls to the EOC.”

The experience of having 2-1-1 staff come into the established Emergency Information Center (EIC) run by the EOC—remembering that they were there only because of intervention by the United Way—underscores the kind of on-the-ground problems that may be encountered without advance planning. “During the first storm [Hurricane Frances],” he says, “there were problems with integration. The 2-1-1 people wanted to limit themselves to 2-1-1 calls. They were taking calls but staying separate.”

However, “integration started to improve with the recovery phase. There were more calls that EIC people couldn’t handle, that they were not prepared to handle. So we saw more integration and more helping each other out....Over time, the camaraderie built.”

Although there was little time before Hurricane Jeanne for reflection and change, he did reorganize the EIC to bring in more victim assistance and consumer affairs people from county government. “We had 2-1-1 people sitting in the EIC section to answer pre- and post-storm calls.

That helped a lot with the integration and relations seemed to get a lot better.”

While he saw a “real change” from one storm to the next in “integrating 2-1-1 into the EIC function,” he does not believe that 2-1-1 could assume full responsibility for the EIC. Rather, Milleli says, “It is the partnership that is going to be important. 2-1-1 is the one to lead during the long-term recovery.”

Scott Badesch believes that “people didn’t see the benefit of 2-1-1 until they needed it. But during this emergency they proved that they could respond. They were there every minute of the day for us.”

Broward County

2-1-1 Broward has an MOU with the EOC to allow them to relocate there and to transfer calls. But, according to Susan Byrne, “The county doesn’t perceive that we are benefiting them. They see themselves as doing a favor for 2-1-1, not that 2-1-1 is beneficial to them.” As a result, their capacity at the EOC is limited to two lines which “makes it hard to promote 2-1-1 during an emergency since we can’t handle many calls.”

During Hurricane Frances, 2-1-1 sent four staff to the EOC, allowing them to have two on duty and two off throughout the five days and four nights they were there. “We are in a separate room

GREAT IDEAS

Here are a group of “great ideas” that emerged during the interviews and debriefing.

- Prepare as many people as possible in advance to answer calls if needed or to assist in other ways in the call center—all staff, board members, staff from agencies in close proximity to you, United Way staff, other volunteers, etc.
- Have a television in the call center to provide up-to-the-minute information and so you are hearing what your callers are hearing.
- Think through alternative ways for your “core group” to remain in communication with one another.
- Build a strong volunteer base before an emergency, not during it.
- Think ahead about what you may need to know—for example, how to contact providers of medical equipment and oxygen after hours—and collect as much of that information as possible in advance of an emergency.



from the county's Hurricane Hotline which is giving information about shelters and debris pick-up. We want to renegotiate so that we can handle crisis calls that come to them." In fact, during Hurricane Frances, the 2-1-1 staff handled six potential suicide calls during the course of 2 hurricanes, underscoring the need for crisis intervention services to be available.

Marion County

In Marion County, 2-1-1 (First Call for Help) is part of the United Way, with after-hours coverage provided by United Way 2-1-1 in Jacksonville. The hurricanes were a new experience for them. "This is always the place people come from other parts of the state to get away from them," said Pete Foy, Vice President, Community Initiatives, United Way of Marion County.

They went into "emergency mode" at the Sheriff's office 24 hours ahead of the arrival of Hurricane Charley and made plans to transfer all of their calls to Jacksonville if their power went out. The director of 2-1-1, Madeline Franco, went to the EOC and transferred up to date information to Jacksonville via fax and phone. "Calls for help to 2-1-1 went to Jacksonville. They then called back to us with names, locations, and needs. But because of the relatively low severity of storm impact in Marion County, very few storm-related calls actually went to Jacksonville. Most calls for help went directly to the EOC who then routed them to United Way which is the designated ESF 15 agency."

Based on their joint assessment after the Emergency, Pete says, "We and the EOC feel strongly that our presence was of considerable value to the entire EOC operation inasmuch we reduced time consuming non-emergency calls and requests. At the request of the Sheriff and EOC, we plan to remain within their central operations during emergencies."

But he does see the value in keeping 2-1-1 operating "at home" as much as possible. "It gives us instantaneous information sharing, it is under our control, and we would be prepared to do it around the clock during an emergency." Toward that end, he has negotiated for funding from the Sheriff's office for United Way to purchase its own generator.

Jacksonville

In Jacksonville, 2-1-1 "has a pretty good working relationship with the EOC," says Bob Arnold, director of United Way 2-1-1. "We want to continue working together so that in the event of another hurricane or disaster, both sides will know what the other has to offer. We presently don't have a seat at the EOC, but feel like we need one because we have a great deal of information and expertise to offer."

2-1-1 Tampa Bay Cares

In Pinellas County, the county government operates its own Citizen Information Center which is staffed during emergencies by county employees. However, due to the number of calls the CIC was receiving and the experience and training the 2-1-1 staff possess, the Volunteer Services Manager requested 2-1-1 staff assistance. They did not, largely because of concerns about asking staff to travel outside in hazardous conditions, particularly when massive evacuations had been ordered in the county.

But, according to Micki Thompson, program manager for 2-1-1, "This raised to the fore the issue of our obligation to county government because of the funding we receive from them, even though there is no provision in our contract to do this work."

Now, active discussions are underway to clarify the role 2-1-1 will play. Tim Closterman, volunteer services manager for Pinellas County, explains, "We realized after the storm how many calls 2-1-1 took. Even last year during a water main break, we recognized that people called 2-1-1. People are used to that number as the place to call to get and give help.

"Before and during a storm, there is only so much you can do. After is where we hope to increase our relationship with 2-1-1. One possibility for them is to take on resource management after a storm - information, unaffiliated volunteers, etc." Although he oversees the ESF15 function for the county, he has only two staff so "it is unimaginable for us to manage the unaffiliated volunteers.

“We only see 2-1-1 as a benefit, an asset, to us. Their operators are trained to deal with people in crisis. They are in tune with the community. If they don’t have the resources, they know who does.”

Orlando

Because many of the 2-1-1s serve multiple counties, one of the challenges they face is the need to relate to the emergency management staffs in each one. For Orlando, according to El Cabrel Lee, at that time Vice President of 2-1-1 Community Services, which serves three counties, “there was a very real question about our capacity to do that. So we worked as best as our services allowed by sharing health and human service resources and agency availability and needs requests. If 2-1-1 had a year-round working relationship with Emergency Management Services more coordinated services may have been possible.”

However, starting before Hurricane Charley arrived, 2-1-1 began sharing resource information with all three EOCs, beginning with a print-out of the disaster resources already in their data base. Although they did not get a lot of public credit for it, 2-1-1 was behind the scenes, feeding updated resource information to each of the EOCs in support of their own citizen information lines as well as to the news media.

Jerry Demings, Director of Public Safety for Orange County, the largest of the three counties served by 2-1-1, credits 2-1-1 for “allowing us to separate out many of the calls for social services. That freed up the calls coming into the 911 center so we could keep our lines as open as possible. 2-1-1 proved to be critical to us in our response to a natural disaster.

“The partnership really worked. We involved the Heart of Florida United Way [host organization for 2-1-1] in many of our press briefings as a way to promote 2-1-1 as an option for people to call. While people may not remember the specific list of phone numbers that are announced, they can remember 2-1-1.”

Managing Information

Right after the storm, we had a Health and Human Services Coordinating Group meeting. Everyone had their own source of resources. No one knew what anyone else was doing. Within one afternoon, Susan [Buza] got it going to use 2-1-1 as the clearinghouse.

It worked out unbelievably well. There was instant updating on the web with a special web site established and publicized for this purpose. My staff bookmarked it, checked it daily, emailed it to the entire staff, and printed it out for people going into the field. It was an excellent tool.

I was going crazy with false information up to the point that 2-1-1 took it on. No one had the information we needed.

The speaker is Marilyn Munoz, District 9 Manager for the Florida Department of Children and Families, based in West Palm Beach. She is talking about Susan Buza, executive director of the 2-1-1 serving Palm Beach County and the four counties of the Treasure Coast.

Susan Buza describes their work this way. “The best thing we did was the data base of crisis information. We segmented it by county, set up an internet site for our staff to get the information they needed and then took the site public. We became the information clearinghouse.”

She stresses the point that “you don’t realize that your data base the way it is the day before is of limited value the day after.”

The work of 2-1-1 to organize and make available current information was a critical contribution throughout Florida. As Micki Thompson of 2-1-1 Tampa Bay Cares put it, “We figured out that our new job was to determine which agencies were open and where they had moved.”

But in virtually every locale, obtaining and managing rapidly changing information was one of the greatest challenges. Listen to these key leaders from Brevard County:

Libby Donoghue, 2-1-1: *“The information we needed was probably floating around the room [in the EOC] but we couldn’t figure out how to fish it out.”*

Don Lusk, Brevard County government: *“Within the room itself, people were so busy on their own tasks, they didn’t have time to share information. In such an intense environment, there always will be problems sharing information within the EOC as well as with others.”*

Rob Rains, United Way: *“People ten steps away from you had key information but you couldn’t get it.”*

Paul Milleli, Director of Public Safety for Palm Beach County agrees. He says, “There is no easy way to respond to the information flow challenge, even though everyone is in close proximity. It is still one of the big issues to resolve.”

It became clear through interviews for this study that too little thought had been given to how to collect, organize, and communicate information needed by the public to handle the emergency. While great efforts had been made by EOCs to provide call centers to receive calls, much less attention had been given to putting accurate, timely information into the hands of people who called. As a result, as Judi Leggett, 2-1-1 Counselor at 2-1-1 Brevard, put it, “We didn’t have a choice about the information we were giving out. We had to go with what we had. If we found out we were wrong, we had to change it and go with it.”

Public information officers within county government were criticized by a number of people interviewed for limiting themselves to putting out press releases and coordinating media contacts rather than taking on a broader information management role. As one person put it, “They need to get past that limit to ask ‘what do people need to know and how do we get it to them?’”

By assuming the information management function, 2-1-1s helped their partners have greater impact. Cliff Smith, President of the United Way of Lee County, home of the 2-1-1, says:

In the past, United Way agencies would spring into action and United Way’s role was to be a cheerleader and then, later on, to give recognition. Now, 2-1-1 has dramatically changed that. It put us into the middle of the information loop. It created opportunities that we didn’t imagine until they happened. We knew more about what was going on and what was needed than anyone else.

We called all of our agencies to assess their capabilities, how they were affected by the storm, what they needed. We became the link—if we hadn’t, it would have taken longer and people would have been calling agencies that couldn’t help them—we knew who could help and we knew how to get information about that out to the agencies.

We weren’t late to the table, creating a role for ourselves. That wasn’t necessary. It put us in position to play a natural role in organizing things. We weren’t bystanders. We have been able to play an active role.

As a result, the United Way helped put together bilingual teams to go into migrant labor camps on one of the barrier islands that was worst hit, pulled people together to set up a distribution center for water and ice at a rest stop on the interstate, and distributed \$20,000 in gift cards they had purchased from Publix supermarkets, Lowe’s, Shell, and Home Depot to respond to the overwhelming level of basic needs.

Despite any advance planning they may have done, most of the 2-1-1s ended up inventing solutions to the problem of information management. In Lee County, says Linda Pankow, “We had thought about using laptops but ended up using white boards. We had 15 phone stations and two large dry-erase boards. As information came in, we updated the boards and handed information sheets out to everyone. We created our own resource information as we went along.”

At the 2-1-1 in Palm Beach County, the staff moved from “cutting and pasting into a Word document” to an internal web site for their staff and then an external web site for other agencies and the public. Jesus Rodriguez, Human

Services Resource Specialist, described the process of building their collection of resource information this way: “Marilyn Munoz at DCF would call us with stuff she was picking up. United Way staff were calling in. We would browse newspapers for information, look at EOC web sites for our five counties, read press releases from county government.” Bruce Greenstein, Network Systems Coordinator, his office mate, continues, “It was a snowball effect. Once they saw Jesus was doing a good job, people began providing information.”

The experience in Orlando was very much the same. Tino Paz, then Director of Information Resources and now Interim Vice President of 2-1-1 in Orlando, said, “Normally, social service information is on a ‘level 4’ of volatility, that is, it is fairly stable. During the storm it was closer to a ‘level 8 or 10’ on that scale, changing almost from hour to hour.” He describes the three key challenges that had to be faced as:

- tracking down data;
- verifying the reliability of information and its source; and,
- repurposing the information for phone operators, after hours support, and others who come for the information.

Their progression was similar to that in Palm Beach. “We had one person compiling new information in Microsoft Word and putting it on the internal share drive. It was updated daily. By the end, we were bookmarking the information for easier access by multiple users. We got better, more user friendly as we went along.”

He identified four key lessons that will inform their work in the future:

- “Simple is best.”
- “Get as much information as possible into the system in advance, even if it is dormant. We will put as much as we can about disaster resources in and then only activate what is appropriate. For example, we will try to put in all possible shelters and then activate only those that are open.”

- “We need to establish MOUs and protocols with both the Red Cross and EOCs for information exchange—and figure out a way to conduct a dry run in advance.”
- “We need to work it out with agencies in advance for them to call us and report their status. Agencies also could use 2-1-1 as a service center for information exchange for their own staff.”

According to Randy Nicklaus, executive director of 2-1-1 Big Bend in Tallahassee, his staff “had to be very creative in getting information during the crisis because agencies typically would not notify us about changes in their operations during the crisis.” Because the 2-1-1 has a memorandum of understanding with the Red Cross chapter that covers the same eight county area that they do, he assigned one of his staff to be at the Red Cross operations center to coordinate information flow.

Identifying Unmet and Emerging Needs

One of the most powerful arguments in favor of 2-1-1 is that it provides data that can be useful in identifying unmet needs and gaps in services. During the Emergency, the Florida 2-1-1s demonstrated that value in real time. “The calls,” said El Cabrel Lee, then Vice-President of 2-1-1 Community Resources in Orlando, “were telling us what we needed to prepare for and to do.”

That value extended beyond the individual 2-1-1 service areas. Ande Miller, executive director of the National Voluntary Organizations Active in Disaster (NVOAD) convened daily conference calls of her member organizations and facilitated many of the Florida VOAD daily conference calls. She says, “Through their participation in the calls, 2-1-1s were able to report on the priority of the type of calls they were getting. This was extremely helpful as another measure of the ebb and flow of needs. In addition the 2-1-1 representative was often able to clarify information for us and shared information from our calls to their daily conference calls. There is no question in my mind that the participation of 2-1-1 added value to our organizations’ response and relief efforts.”



Jane Morgan from the American Red Cross, President of NVOAD, echoes that. “2-1-1s were giving us good information on the type of calls. They also were finding information on services available which allowed us to shift resources to best meet needs.”

“People were lonely, scared, couldn’t leave their houses. They wanted to talk. Some were just so thankful they could call and get a person and not a machine. We could relate to the situation because we were here. People liked that.”

Demetra Russell, I&R Specialist at 211 HelpLine in West Palm Beach

Consider these examples:

- After Hurricane Frances, 2-1-1 Community Services in Orlando was able to identify needs for food in Osceola County and compare that with the availability of resources there. As a result, the Heart of Florida United Way stepped in to provide feeding services for over 1,000 people.

- During Hurricane Charley, the 2-1-1 HelpLine in Lee County identified a group of seniors who did not have transportation to a shelter because they had not pre-registered as having special

needs. 2-1-1 staff later shared that story with a home health agency that had evacuated its clients to a motel. During Hurricane Frances, then, that agency called United Way and offered to transport those stranded seniors.

- In Charlotte County, it was the I&R staff who discovered that Meals on Wheels had ceased operation. “We didn’t know their folks weren’t getting meals for a week, when they began to call us,” said Joy Duperault. “We hooked up with another agency to send case managers to find the people. The Meals on Wheels building had been severely damaged and their volunteers either had evacuated or were dealing with damage to their own homes.”

Cliff Smith, President of the United Way of Lee County, underscored how 2-1-1 assisted them help other agencies focus their resources. He said, “We began to alert the Red Cross about communities not getting help. Then, the Red Cross started asking for input on where to tar-

get their efforts. We were able to do it because, with 2-1-1, we were in the middle of it all.”

Reassuring Callers

Anxiety and the need for reassurance was perhaps the defining characteristic of the vast majority of calls received by 2-1-1s immediately prior to, during, and immediately after the storms. In each phase, the intensity of the calls was ratcheted up from those normally received. For example:

- Joy Duperault in Charlotte County: “We were getting calls from people who seemed to be in shock. They weren’t even sure what to ask for. They would describe their circumstances and we would try to figure out how to help. We had lots of calls from home-bound seniors and from seniors whose homes had been severely damaged.”
- Debra Harris at the 2-1-1 Crisis Center of Tampa Bay in Tampa: “We have seen an increase in the number of mental health calls, up to 40% of our total versus the normal 20-25%. People are anxious and scared.”

One of the key roles played by 2-1-1s, then, was to provide reassurance to callers removing a burden from EOC staff who were not trained for that role. For example, Paul Milleli, Director of Public Safety in Palm Beach County, said, “Staff in our Emergency Information Center were glad to have [2-1-1 staff] there because they could handle calls from people who were emotionally upset.”

Similarly, Kasha Owers, Chief Operating Officer of the Area Agency on Aging based in West Palm Beach, said, “2-1-1 was able to crisis counsel. They really excel in that. Where we tend to deal with the request, not the emotions, they did an excellent job with the intangibles.”

This service was particularly important to her clientele because, she says, “There is a lot of emotional devastation in seniors’ lives [as a result of the storms]. That is the worst...lots of shock and denial. A lot of people have given up.”

Even when information was otherwise available, 2-1-1s reported getting calls from people seeking to hear it again. Rene Favreau, I&R Specialist at 2-1-1 in Palm Beach County talked about the importance of 2-1-1 in getting people to shelters. Even though it was in the paper and on TV and radio,” she said, “people wanted to talk about it. They needed a lot of reassurance.”

Linda Pankow in Lee County had a similar observation. “People wanted to hear a live voice, even if it was saying the same thing that was on the TV news,” she said. “A lot of the calls were ‘anxiety calls’.”

Mobilizing and Managing Volunteers

2-1-1 is not only a way to “get help;” it also can be a way to “give help.” While the extent to which 2-1-1s play a “give help” role varies widely from community to community, not only in Florida but around the country, it became clear during the Emergency that there are important ways in which 2-1-1 can help mobilize and manage volunteers and cash and in-kind contributions.

Manasota

The United Way 2-1-1 of Manasota, Inc., Volunteer Services of Manatee County, Inc., and the United Ways of Sarasota and Manatee counties created one of the strongest “give help” partnerships.

The Volunteer Center of Manatee County is considered one of the most innovative in the country and is well-known for its ManaTEENS program. Because Manatee County was not significantly impacted by Hurricane Charley, the Volunteer Center put priority on serving neighboring DeSoto County, a rural county of only 35,000 people in which almost half of the housing units were significantly damaged and half the population displaced by Charley. The Volunteer Center, with support of local United Ways, opened a volunteer reception center in the American Legion post.

Adraine LaRoza, Executive Director of the Volunteer Center, describes the partnership this way:

There was no communications structure left in DeSoto County, no cell phones and no land lines. The only way to get information out about needs was to leave there. In the evenings, we would communicate with 2-1-1. Then they would update their web site and their staff and go to the media. They let the public know what volunteers had done each day, what was needed, when and where volunteers should go the next day and how they should prepare for the work.

Alberto [Suarez, executive director of 2-1-1] even came out and worked as a volunteer to see what it was like so the 2-1-1 would be better prepared to help volunteers who called.

2-1-1 was incredible. We depended on them totally. It worked like a charm...a great partnership. I can't say enough about it.

In an email posted on the United Way of America 2-1-1 Listserv, Alberto Suarez, executive director of United Way 2-1-1 of Manasota, described the experience this way:

The Volunteer Center's reports would let us know what was needed in the field (ie-work gloves, water, rakes, chainsaws, etc). These newsletters were done DAILY by Adraine and posted on the 2-1-1 website.

Because of the ability of our Board Chairman to have contacts developed within the local media...we were getting lots of air time for 2-1-1...driving our website traffic and call volume up. The night Charley hit, our call center did 800 calls in one night. Extra staff during after-hours for our call center was provided by the Manatee Volunteer Center.

Through the partnership created among United Way 2-1-1 of Manasota, Inc., the Volunteer Center of Manatee County, and the local United Ways, some 8,800 volunteers were mobilized and managed over the first two weeks after Hurricane Charley, providing an estimated 80,000 volunteer hours of help to the people of DeSoto County.

“It worked because, in terms of our mentality, 2-1-1 has always been about both getting and giving help.”

Alex Young, President, United Way of Sarasota County

Every 2-1-1 call center should have the type of relationship we have with our local Volunteer Center. Because of this relationship 8,800 volunteers were screened and put to work to help those in need. It really helps promote and optimize the GIVE HELP portion of our system and at the same time make an impact in the community by coordinating and collaborating in an effective manner all volunteers who want to help.

Alex Young, President of the United Way of Sarasota County, stresses the multi-county response:

While both Sarasota and Manatee counties were impacted by every storm with flooding and wind, we were not really hit hard. Our most significant contribution was as a place through which people could give help. 2-1-1 was the conduit to get people into the volunteer reception center and also a way for people to find out where to give money or in-kind contributions.

As a result of the partnership, longer-term changes are happening. On January 17, 2005, Martin Luther King Jr. Day, the Volunteer Center opened a permanent office in DeSoto County. Funding is being sought to expand 2-1-1 services to DeSoto County. Discussions also are underway to strengthen the relationship between 2-1-1 and county governments. Alex Young says, "County government now understands better the need to get 2-1-1 into the EOC. We also have proposed to give them the 2-1-1 number to use throughout the three counties to use during emergencies, rather than the 10-digit number for each county."

Broward County

In Broward County, 2-1-1 Broward was part of a coordinated county effort, the Community Response team that, according to Susan Byrne, 2-1-1 President, "got put together at the last minute. It included the school system, Volunteer Broward [the Volunteer Center], the United Way and the Sheriff's Office as well as us.

"2-1-1 was the entry point and others were the delivery mechanism. Low income, disabled, and elderly people were asked to call 2-1-1. We screened their requests and then relayed them to Volunteer Broward which organized the vol-

unteer help to respond. In the week or so it was active, we had 156 separate calls, about half of which we referred on for assistance."

2-1-1 Tampa Bay Cares

2-1-1 Tampa Bay Cares is both a 2-1-1 I&R and a Volunteer Center. As a result, says Cynthia Fox, their executive director, "we see ourselves as mobilizing and managing volunteers to help and connecting them with specific locales. There is no one else wanting to deal with unaffiliated volunteers. We believe the message in its entirety—2-1-1 is to both find and give help."

They are unique in Florida in that the 2-1-1 is the public access point for the Volunteer Center with I&R specialists doing volunteer referral.

After Hurricane Charley, they received "tons" of calls from volunteers and donors. They were able to send volunteers directly and immediately to DeSoto County to help with water and ice delivery and debris removal. They handled over 150 such offers of help in the first five days.

Gainesville

In Gainesville, the United Way Information & Referral stepped in to fill the gap created when The Volunteer Center, which had recently undergone major staff changes, was unable to perform its designated role. Jan Zak, I&R Program Director, stated, "We made heavy use of groups of volunteers from civic, social and faith groups. Because of liability issues around matching individual volunteers with individuals in need, we assigned unaffiliated volunteers to work with existing groups." The unexpected need for United Way to step into this role reminded her that "you always have to have a fallback position. But, even when there are a million things going on, the people calling must come first. Period."

Serving as Intake Points

It is not unusual for 2-1-1s to provide intake services for public sector human service agencies, often doing initial screening to determine eligibility. In Palm Beach County, the 211 HelpLine is the manager of the homeless hotline and daily screens callers and makes appointments for clients with county social workers. That work began 18 months before the hurricanes. In response to another natural dis-

aster, a major tornado that hit the county, 211 HelpLine established a track record of being the place to call to get connected with housing recovery assistance.

When county agencies began meeting after Hurricane Frances to discuss how to help residents with home repairs, a person from the county housing agency who had been involved with the tornado relief efforts suggested that “the 2-1-1 lady should be here.”

Now, the 2-1-1 HelpLine is provide the same screening service for people seeking help from the county for home repairs because of the storms, screening for eligibility and making appointments with government agencies while the caller is on the phone.

Becky Gregory, Director, Human Services and Veterans Services for Palm Beach County, is a strong believer in the value of 2-1-1. She says, “2-1-1 has given an exceptional boost to the efficiency of our operations and the effectiveness of our staff. Because 2-1-1 is respected as the place to call, it is considered neutral. It has created the ability for us to say, ‘This is our gate, how you come in if you are serious about changing your life.’ It is doing a level of triage that couldn’t be done any other way. 2-1-1 always exceeds our expectations.”

The United Way of Central Florida serves three counties—Polk, Highlands, and Hardy—with a combined population of over 600,000 people. Their I&R is not a 2-1-1 but does provide comprehensive services to the three counties and provides 24/7 access through an arrangement with a local crisis line. Terry Worthington, President of the United Way, describes the role the I&R played in response to the storms this way: “After Hurricane Charley, we discovered that there was not a strong plan to put volunteers to work and to receive donations. We were able to respond immediately and worked with the Salvation Army to set up a receipt mechanism and warehouse that became the volunteer coordination center.

“We were seen by the community as a center of activity for hurricane response. The I&R became the intake center for everything we are doing. The connecting point for most of it was the I&R.”

Sustaining the Connection

The actual time a hurricane is present in any given area is relatively brief. In a fast-moving storm, the eye can move over in a matter of minutes. Even in slower storms, it may be only one or two hours of the most intense winds and rain.

But the impact of the storms has lasted much longer, of course. Linda Pankow at United Way 2-1-1 in Lee County, says, “We need to be prepared for it to be long-term. It is likely to be a two-year recovery. It is not a two-day thing.”

For 2-1-1, this means continually increasing demand for their services. Patty Maddox of the Winter Park Health Foundation, a funder of 2-1-1 Community Resources in Orlando, points to the ongoing value of 2-1-1. She says, “As time goes on, the importance of 2-1-1 won’t diminish because there are long-term impacts on people. This is a source of valuable data both for planning and resource management.”

Six weeks after the storm, Linda Pankow at United Way 2-1-1 in Lee County where call volume was still 150% higher than normal, could say that “80% of the calls are storm-related. They may sound like regular 2-1-1 calls but the need was created by the storm. For example, we are seeing the need for financial assistance because of kids not being in school and it costing the family more for food. We also are getting calls from middle class as well as low income people because of business closures and loss of work.”

At 2-1-1 Brevard, call volume was 36% higher than normal for the three months after the Emergency. But it is not just a matter of higher call volumes. It also is the nature of the calls and the callers. Libby Donoghue says, “The things people are calling about now are more difficult—for example, an isolated senior woman on oxygen with home damage and unable to get help to repair it. It is a real source of stress for our staff.”

An Associated Press story datelined September 28 reported that “mental health experts caution that the emotional strain will worsen in the next few weeks as numbness wears off and people grasp the devastation around them. Authorities

are warning of an increase in alcohol and drug use, as well as child abuse and other violence.”¹⁰

This was confirmed by the observation of El Cabrel Lee in Orlando that just weeks after the storms his staff was seeing an increase in domestic violence calls.

The high quality of the work done by the 2-1-1s also has raised expectations. Linda Pankow noted that even over the course of the crisis “new people found their way to 2-1-1. Before Frances [the second storm to impact Lee County], we were getting calls even before the Hotline was activated. Word of mouth is building call volume.”

Government officials also have heightened expectations.

Marilyn Munoz of the Florida Department of Children and Families underscores the esteem in which they now hold 2-1-1 when she says, “We now say, ‘Please hang up and call 2-1-1’ rather than our staff doing I&R. We don’t want to do I&R because 2-1-1 is the best source of referrals.”

Don Lusk, assistant county manager in Brevard County, sees a “large role that 2-1-1 can play post-storm. They could be collector of information from people with needs and complaints. We need a local number for people to call who think they are not getting help and for people afraid to call the government for help. We need to have a local advocate to help people who fall between the cracks. 2-1-1 could do those things.”

Fortunately, he goes on to stress the need to decide how they want 2-1-1 to fit in and, indeed, whether their work should be classified as a separate “emergency service function” in the overall array of emergency management and disaster response services. There needs to be, he says, “a recognized, official 2-1-1 function within emergency preparation and management plans” that positions 2-1-1 to receive significant to resources to build their capacity to fill these roles.

¹⁰ “Storm stress mounts: experts see rising suicides and violence,” by Jill Barton, Associated Press Writer, Associated Press. New York: September 28, 2004.



Chapter Four

The Value of Partnerships

A disaster is not a time for “turf” to get in the way of responding to the needs of the community. It is a time for strong, collaborative efforts that build on the capacity, expertise, and talents of many different organizations. For 2-1-1s, there were four key partnerships—with EOCs, with United Ways, with Volunteer Centers, and with one another—that helped define the nature and scope of the role they played and the contribution they made.

The most important of these, with EOCs, was discussed in detail in Chapter Two. The purpose of this chapter is to discuss the other three key partnerships—with United Ways, with Volunteer Centers, and among the 2-1-1s themselves.

Partnerships with United Ways

Ted Granger, President of the United Way of Florida, captured the central importance of the partnership between 2-1-1s and United Ways throughout the crisis in this way: “2-1-1 proved in many communities that it is of inestimable value in linking people with resources and services, and in positioning United Way as *the* community impact agent in their areas.”

The state-level partnership between 2-1-1s and United Ways existed well before the storms. Ted Granger has long been a valued member of the FLAIRS board of directors. FLAIRS and United Way of Florida joined together to develop the strategic business plan for the Florida 2-1-1 Network. The two organizations worked together to pass the state legislation authorizing development of 2-1-1 and now are jointly seeking funding from the legislature to make statewide access to 2-1-1 a reality.

At the local level, five of the 2-1-1s are departments of a United Way. In the balance, the local United Ways are major funders and advocates for 2-1-1 and, in many of the communities where 2-1-1 is not yet available, the United Way is stepping forward to encourage its development.

During the Emergency, the partnership served both parties well. By working together, 2-1-1s and United Ways expanded each other’s capacity to serve their community and enabled both to build stronger relationships with EOCs and with other nonprofit organizations.

For 2-1-1s, their partnership directly connected them to the significant community leadership roles undertaken by United Ways statewide, leveraging the value of the data being collected by 2-1-1s, focusing greater attention on their contribution, and bringing them new resources. Together, United Ways in Florida raised and committed over \$4 million for disaster relief, arranged distribution of hundreds of thousands of gallons of water and tons of ice, mobilized and managed thousands of volunteers, and organized and managed in-kind contributions of everything from trucks and fork-lifts to clean uniforms power company linemen and clothes

for people who had lost their homes. For United Ways, the partnership with 2-1-1 better positioned them to be at the heart of the emergency response effort and gave them new opportunities to demonstrate community impact.

John Hawkins, President of the Heart of Florida United Way in Orlando, the host organization for 2-1-1 Community Services, Inc., says, “2-1-1 is not only a resource to connect citizens to the help they need, but also serves as a strategic tool that positions us as an impact organization, planning for the future needs of this growing community. I can’t think of a better example of how United Way should be seen in the community. It demonstrates that we are more than a fund-raiser.”

Patty Maddox, president of the Winter Park Health Foundation and chair of the 2-1-1 Advisory Board says that “the most striking evidence of the impact of 2-1-1 can be seen in the changing attitude of the United Way board of directors. After Hurricane Charley, the reports coming from 2-1-1 led to a new understanding of the value of 2-1-1 and that has escalated since. In a recent United Way planning exercise, every group identified 2-1-1 as a priority.”

In those places where the 2-1-1 is part of the United Way, the strength of the partnership was clear:

- In Lee County, “We weren’t late to the table, creating a role for ourselves,” said United Way president Cliff Smith. “That wasn’t necessary. 2-1-1 put us in position to play a natural role in organizing things.”
- For the United Way of Central Florida, their I&R was what Terry Worthington called “the intake center...the connecting point...” for the massive effort the United Way undertook to contribute to disaster relief.
- In Gainesville, where the United Way is the designated ESF 15 agency, the I&R played a key role not only in connecting people with services but also in mobilizing and managing volunteers. The entire United Way of North Central Florida staff came together as a team, staffing the EOC, assisting with communications, and working right along

side volunteers to make sure people got the water, food, ice and other help they needed.

There are similarly strong examples in places where the 2-1-1 is not within the United Way:

- In Palm Beach, the United Way served as an advocate for 2-1-1, ensuring that there would be a place for them within the EOC when they had to leave their own building. That 2-1-1 could continue to handle calls benefited not only people in Palm Beach County but also in Martin County which it also serves. “If not for 2-1-1, our own phone lines would have been swamped,” says Jim Vojcsik, President of the United Way of Martin County. “Since they handled calls from people who needed help, a lot of the calls to us were from people who wanted to help.”
- In Brevard County, the United Way helped collect and manage the resource information needed by 2-1-1. “We consolidated the most relevant information in a simplified form,” explains Rob Rains, President of the United Way of Brevard County, “and provided it to the media and to employers to pass on to their workers. We saw this as a good role for us to fill in partnership with 2-1-1.”

GREAT IDEAS

Here are a group of “great ideas” that emerged during the interviews and debriefing.

- Test your emergency plan with people outside your agency.
- Be on the “priority power list” with your public utility if possible.
- Build the expectation among agencies in the community that they will contact you during and immediately after an emergency to report their status since you won’t have time to contact them.
- Offer agencies a “message center” service through which their workers can call 2-1-1 to get instructions about reporting to work.

- In Broward County, the 2-1-1 and the United Way were two of the four key partners in the Community Response Team pulled together to help low income, disabled, and elderly people get help with debris removal.

United Way and 2-1-1 officials are asking their human service agency partners, emergency management and local media to engage directly with their local 2-1-1 call centers to help create a database of available resources, so that 2-1-1 can better serve the tens of thousands of callers they are expecting to serve in the coming days. At the same time, partner agencies are also requested to inform these call centers with the types of resources they need, so 2-1-1 can help direct these needed resources their way as well.

Partnerships with Volunteer Centers

In communities with Volunteer Centers, determining how 2-1-1 can best play a “give help” role must come from a dialogue between the two organizations. Ideally, that will result in a well conceived partnership in which 2-1-1 can be leveraged to make it easier for people to volunteer.

The Emergency underscored the potential for such partnerships. In Manasota, for example, the 2-1-1 and the Volunteer Center have representatives on one another’s boards and their executive directors are in regular contact. For DeSoto County, 2-1-1 became the “front office,” presenting the need for volunteers to the public and serving as the way people who wished to volunteer could do so, while the Volunteer Center was the “back office,” on the ground in the county, organizing and managing volunteers and feeding information back to the 2-1-1. Not all of the partnerships worked as well. In Lee County and in Gainesville, for example, the 2-1-1s had to assume larger than anticipated roles because the Volunteer Center did not have the capacity to fulfill their agreed to roles.

Some Volunteer Centers, not only in Florida but throughout the country, have expressed concerns that 2-1-1s might pre-empt their leadership role for volunteering in the community. Adraine LaRoza, Executive Director of Volunteer Services of Manatee County, admits that when 2-1-1 was first established through a merger of two existing I&R services, she “saw it as a real nightmare.”

But now, she says, “I see it as a great way to build capacity in our community. It is so silly that it can’t work this way everywhere.”

The experience in Manasota is a clear example of what can happen when the two work together in ways that build on their respective strengths, toward a shared goal of increasing the level and effectiveness of volunteer engagement in the life of their community. As with so many of the other elements of 2-1-1s’ response to an emergency, however, the foundation for that collaboration and the protocols for how it happens must be worked out in advance if, together, the two organizations are going to make the maximum contribution to their community.

The Value of the 2-1-1 Network

FLAIRS is considered to be one of the strongest I&R state associations in the country—with a strong stable membership, a web site that directs users to online databases for most counties, a substantive annual conference, and a history of providing national leadership for the I&R field. It has provided the framework within which 2-1-1 has developed in Florida and has encouraged and supported ongoing networking among the emerging 2-1-1s as well as partnering with United Way of Florida to develop the strategic business plan for the Florida 2-1-1 Network.

That history served the 2-1-1s well during the Emergency as they found one another to be sources of mutual support, learning, and back-up.

The primary communications vehicle was a series of conference calls convened by Peter Bishop, 2-1-1 Manager of United Way of America and President of FLAIRS. United Way of America offered their 800 conference line to the 2-1-1 programs so that there could be a daily one hour call to coordinate services throughout the state.

“The outstanding work done by the 2-1-1s in Florida during the hurricanes epitomizes the community impact role of 2-1-1, especially when built upon strong partnerships with local United Ways, human service agencies, emergency management, and local media.”

Brian Gallagher
President and CEO, United Way of America

All 2-1-1 and I&R programs were invited to be on the calls.

The daily calls were well attended in the few days leading up to a hurricane and for two or so weeks after each. As a new hurricane came up, the focus would switch to preparations. Each program made a situation report, and reported any needs or special circumstances.

UWA staff who had been monitoring other national group daily calls such as FEMA and VOAD also were on the line. The information from the FEMA and VOAD calls as well as daily Florida United Way

CEO calls would be communicated to the 2-1-1s. Similarly, any questions 2-1-1s had for these groups would be captured and later communicated to the other groups. In this manner, the 2-1-1s became an integral part in the national response to the hurricane by a variety of national

organizations and at the same time had a somewhat coordinated response statewide.

In addition, Peter Bishop became the central clearinghouse for email information about the hurricane, getting information and forwarding to various listservs and email groups. During the almost two months of hurricanes, he sent out over 150 email reports, questions, comments, etc. to all of the 2-1-1 programs, forwarding on various information from other hurricane responders.

“Those conference calls were very valuable,” said Susan Byrne of 2-1-1 Broward, “because we were learning from each other.” They also were valuable, observed Bonnie Baker, Vice President of the Florida Children Children’s Forum, host of the Florida Child Care Resource and Referral Network, because “as another statewide network, I could see people’s anxiety and their need to connect with others. The communication link was vital. It was very moving to see how supportive everyone was.”

Randy Nicklaus, executive director of 2-1-1 Big Bend in Tallahassee and former national president of AIRS, concurred in the value of the calls but pointed out that “as a network, we had not yet worked through system issues. The calls made it easier to communicate with each other. But it also was clear that those who have worked well together in the past, worked well together here. For those who hadn’t been very involved before, it was harder.”

When FLAIRS convened the 2-1-1s to debrief about their work during the Emergency, the participants identified five key implications for the Network. They were:

- We need to take a new look at some of the elements of the statewide system we described in the business plan to make sure they stand up against this experience.
- We have greater recognition for 2-1-1 now. How do we take advantage of it?
- We need to get in the state government’s emergency plan so that we can become eligible for cost reimbursement just like other emergency agencies.
- The more we know about each other, the more we learn and the more we can improve, individually and collectively.
- We need to accelerate our work toward a statewide system so that we don’t let rural counties fall out.

The group agreed that one of the elements of the proposed statewide system that they would want to reconsider was the plan to develop a single, integrated statewide database within three years. Among the rationales for that plan was that it would “ensure complete system-wide redundancy in case of natural disaster or emergency, allowing any center to accept and handle calls from any other, potentially important should one or more centers be forced to close.” It also would facilitate statewide coverage by simplifying access to the resource data required for some call centers to handle after hours calls for others and it would support a single publicly accessible web site.

“The beauty of the system was the ability for us to work with other 2-1-1s, not only in-state but beyond. From outside, it was seamless. Everyone was operating under the same standards.”

Emery Ivery, Senior Vice President,
Heart of Florida United Way, Orlando

Although this is a sound rationale, similar to those adopted by other statewide 2-1-1 systems, there seem to be three reasons why the experience of the hurricane emergency led to the conclusion that it should be rethought.

First, it became clear that, as Susan Buza of West Palm Beach put it, “Our existing data base had no value.” As described earlier, in the immediate period of the storm—immediately prior, during, and in the first phase of recovery—the 2-1-1s had to deal with rapidly changing new information that, for the most part, could not possibly have been in their data bases in advance. There was general agreement that simply putting what was already in their databases together in a single location would not have been of great value in responding to the emergency.

Second, although there were limited examples of 2-1-1s forwarding calls to other 2-1-1s to handle—most notably in Orlando where calls were forwarded at different times to Tallahassee, Tampa, Jacksonville and Atlanta—it only worked if the originating 2-1-1 continued to develop and share resource information, often simply in a PDF format. Again, having a single statewide database did not appear that it would be helpful because the information most in demand was rapidly changing and often difficult to obtain.

Third, a strong feeling emerged that it was of high importance for 2-1-1s to remain open and operating in their own communities, that being part of the local reality contributed to their ability to effectively respond to callers. Because none of the 2-1-1s were forced to shut for a lengthy period following the storm, there was no significant need for other 2-1-1s to access their regular data bases. As was stated by the debriefing group, “We need to prepare to share information globally but respond locally.” It was not assumed that doing so would require a single database.

It is important to put this discussion in the context of the original development of the idea of a statewide database. In fact, it had been one of the most difficult considered by the original strategic planning team because it went to the heart of the kind of collaboration needed to make the Network successful. It was symbolic of the

need for well-established 2-1-1s to think and act differently in order for the Network to be truly successful. While there was sufficient consensus to include the single database in the plan, there was not deep commitment to it. The experience of the hurricanes thus offered a good opportunity to revisit the issue.

This is not to say that the Network will choose not to move forward with the original plan for a statewide database. Rather, the experience of actually going through a major emergency together has provided members of the Network with new data and perspective that will make their consideration of the issue more effective.

The basic idea of cooperating to make resource information easily available remains strong. Ted Granger points out that “while creating a single statewide database has been put on hold, all 2-1-1s are working to ensure their databases are available on the web so, in effect, there will be a statewide database comprised of the individual 2-1-1 sites. They all can be accessed through the FLAIRS website, which will act as the single point of entry to the statewide system.”

It is important to note that there was some evidence of the potential contribution of an extended 2-1-1 network. For example, Sharon Tierra, Project Manager for Vermont 2-1-1 was referring people in Vermont to 2-1-1 call centers in Florida. Calls from Florida also came into the call center in Vermont. She says, “In one case, we got a call from a woman who lives on one of the islands in Palm Beach County that was heavily damaged. Both she and her husband have lost their professional jobs as a result of the storm and now need to relocate because a dispute with their landlord over damages. The caller was considering relocating to Vermont but described financial and legal obstacles. We referred them directly to their local 2-1-1 center in West Palm Beach.”

On a lighter note, the Connecticut 2-1-1 sent their colleagues in Lee County a “care package” of what Mary Hogan described as “homemade stuff, cookies, and keep up the good work notes.” Linda Pankow of the United Way 2-1-1 there reports that it “had a huge positive impact on the staff.”





Chapter Five

Operational Issues

The Value and Limitations of Advance Planning

No Florida 2-1-1 would dispute the absolute value of advance planning. But they would mix it with the recognition that plans need to be changed as the situation warrants. For example:

Bob Arnold, United Way 2-1-1 in Jacksonville: “We all have emergency plans. Ours worked to a point and then we had to improvise.”

Libby Donoghue, 2-1-1 Brevard: “We had an emergency plan that was good enough for accreditation. But now, we will be revising it based on our actual experience. We had to play it by ear a lot of the time but we learned as we went along.”

Linda Pankow, United Way 2-1-1 in Lee County: “You need a plan—actually, plans A, B, C, and D.”

2-1-1 Big Bend which ironically was in one of the least impacted areas of the state, had developed relatively extensive emergency plans. Executive director Randy Nicklaus noted that they had participated in a special simulation exercise prior to Tropical Storm Bonnie and, as a result, had put in place a basic structure for disaster management and had developed twelve emergency handbooks for their staff. They also had established memorandums of understanding with each of the EOCs in the eight counties they serve.

Micki Thompson at 2-1-1 Tampa Bay Cares, also in a relatively less impact area, used the experience they were gaining in preparing for the impending storms to “rewrite the disaster plan to fit reality into it, primarily in the preparation phase. It became a truly experiential plan.”

Among the features of the plan were check lists of duties for each staff member for both pre- and post-storm. “We learned the importance of defining specific roles for everyone,” she said, “including the chair of our board.”

The most important lesson to be drawn from the total experience, perhaps, is of the need for flexibility. Linda Pankow says, “Don’t be disappointed if you don’t have everything right. You need to figure out what is needed every day.” In the same vein, Libby Donoghue advises, “Be prepared in your mind to be flexible and creative. You may not be able to do exactly what you thought was in your little box of responsibility.”

Remaining Open During a Hurricane

One of the key features of 2-1-1 is that it is available all the time—24/7/365. Offering people the ability to reach a live, trained information specialist is even more important in an emergency situation. But, in

Florida, the Emergency raised real questions about the ability of 2-1-1s to achieve that goal.

Hurricanes are unique natural phenomena. Their existence usually is known weeks in advance. With sophisticated tracking techniques, the paths they likely will take can be projected relatively accurately. People in their path usually have time to evacuate. And, they move through any given geographic point relatively quickly, usually in a matter of a few hours.

It was in the period immediately before the storm hit and during the storm itself that the question of remaining open was raised. Two major factors came into play in reaching a decision.

First, there is the question of the safety of the facility in which 2-1-1 is located. At 2-1-1 Tampa Bay Cares, hurricane shutters were on order prior to Hurricane Charley but had not yet arrived. “We are in a glass building so it was clear early on that we couldn’t stay in it,” said Micki Thompson. Although the shutters had arrived and were installed by the time Hurricane Frances came, concerns about their roof led them to close late on Saturday evening, September 3 when they thought the storm was imminent. As it turned out, the hurricane was very slow moving and did not hit until the following Monday, Labor Day, keeping them closed until early Tuesday morning.

A similar decision was made by Susan Buza at 2-1-1 in West Palm Beach because “our building is not hurricane safe.” She later described her immense relief at “going back and seeing that building was still there.”

Second, there is the question of whether 2-1-1 staff is able to and willing to be at work. This was the case at the Crisis Center of Tampa Bay when they made the decision to close for 24 hours during Hurricane Jeanne because, according to Debra Harris, “We don’t want our people on the roads if the emergency folks aren’t on them.”

The Crisis Center introduced another factor into their decisions on whether to remain open. “We also decided we need to give our people a chance to evacuate if they wish to,” says Debra.

Bob Arnold at United Way in Jacksonville echoed that when he said, “We realized that you can’t force people to stay on the job. We may have to revisit the ‘we will stay open no matter what’ belief as it may not be completely logical.”

There may be a difference, however, between “being open” and ensuring that the 2-1-1 number is answered throughout an emergency. Roy McBean, chair of the board of United Way 2-1-1 of Manasota, says, “During the storm we got significant exposure because the number was appearing on TV. The public needs to know you are there. If you aren’t when they think you should be, it causes a problem.”

El Cabrel Lee in Orlando says that although “we stayed up and running because we have clientele who call us no matter what,” he feels that there is a need for emergency management services to work with 2-1-1 across the state well in advance before disaster strikes. He adds, “I think greatest value is post-storm and the coordination and distribution of met and unmet needs.” Like others, he sought a way to keep

GREAT IDEAS

Here are a group of “great ideas” that emerged during the interviews and debriefing.

- Be prepared to be mobile and self-sufficient. Have at least one laptop and small portable printer, up to date data base on CDs, and basic office supplies ready to go.
- Have a generator, sufficient to power lights, computers, and phone system, lined up in advance.
- Be sensitive about children and pets—in identifying available shelters and in accepting the need for your employees to bring them into the workplace.
- Encourage staff to have their own personal disaster plans—and support them in taking care of themselves and their families if disaster strikes.
- Consider whether you need to provide transportation for staff to ensure they can make it to work safely.
- Have emergency contact information, including cell phone and home phone numbers, for key staff of other agencies and for other 2-1-1s.
- What’s Plan B for your facility?
- Explore the possibility of acquiring battery back-up for your phones.

the 2-1-1 number as accessible as possible. So, during Hurricane Charley, they forwarded calls to staff cell phones. “For the people who called, they were very appreciative of being able to talk to someone, he says.” 2-1-1 Brevard, when it closed during Hurricane Charley, made a similar choice by forwarding calls to a staff person’s home.

As the Emergency wore on, Orlando went a step further, forwarding calls to other 2-1-1s to handle. At various points, calls were forwarded to Tallahassee, Tampa, Jacksonville, and when Frances blanketed the entire state, to Atlanta, Georgia. The key to being able to do so, however, was to have 2-1-1 staff *at home* continue to develop resource information and pass it along to where the calls were being answered.

In those places where the 2-1-1 played an integral role within the EOC—either by prior arrangement as in Lee County or in response to a newly recognized need as in Charlotte County—the question of whether 2-1-1 would be open at all times was moot.

“We are tired, mentally exhausted, and need a break. But if another one comes, we’ll be here.”

**Debra Harris, Director
2-1-1 and Hotline, Crisis Center of Tampa Bay, Tampa**

In those places where 2-1-1s had limited capacity within an EOC to handle calls they had forwarded there, as in Brevard County and Palm Beach County, there would be a reasonable question as to what extent they were, in fact, “open.” Bob Arnold poses the question this way: “We may have to close and forward calls [to a location outside our community] for 12-24 hours. Is it better to only answer 2 lines locally or all 15 lines from a distance?”

When the 2-1-1s came together for a debriefing in November, they concluded that in this case, like so much associated with their experience with the hurricanes, there is no single right answer. The impact of the storms simply was so variable and the local relationships so different as to preclude having a single standard for how 2-1-1s should operate during such a crisis.

They did agree on three basic principles:

- They should have plans in place to have their phones answered whether by them or by someone to whom they forward the calls.
- The 2-1-1 in the community hit by an emergency needs to be prepared to collect and communicate the information required for someone else to adequately respond to their forwarded calls.
- It is important to return to full operation “at home” as quickly as possible because they will be more effective in serving their communities from within than from long distance.

Taking Care of 2-1-1 Staff

“People are tired. We have been beaten up. Without the hurricanes, we already had a full agenda. We need to get back to normalcy. It has been a wonderful ordeal.”

Although that was El Cabrel Lee in Orlando talking, it could have been any of the executives of any of the 2-1-1s. The storms disrupted the lives of those who were taking the calls at 2-1-1s, not only because of damage to their homes and uncertainty brought to their personal lives but also because of the constant exposure they had to the problems of others. Dale Phillips of the Sheriff’s Office in Charlotte County captured the challenge when she said, “The stress level for them was unbelievable, the same as for 911.”

Listen to the voices of just a few of the I&R specialists:

Diane Elliott in Charlotte County: “It was frustrating to hear people in such a panic. You wish you could have done more.”

Terry Vail in Charlotte County: “It was exhausting when the calls were so repetitive about roof tarps.”

Latanya Russell in West Palm Beach: “We feel helpless now because there may not be resources available to help people.”

Judi Leggett in Brevard who spent four days locked down in the EOC for Frances and three days for Jeanne: “You just have to work the call, get the person calm. You have to know when it is getting to you. I would walk outside and have a cigarette.”

The effect on staff was cumulative. Libby Donoghue of Brevard 2-1-1 describes the change from Hurricane Frances to Hurricane Jeanne: “The first time we went to the EOC, for Frances, there was a lot of activity, it was very high energy, really busy and noisy. But for Jeanne, it was much quieter, more subdued. People looked like someone had hit them.”

On a conference call just prior to the arrival of Hurricane Jeanne, Libby reported to her colleagues statewide, “Our staff is tired and cranky. But they are squaring their shoulders and getting ready to go to work.”

Despite their demonstrated ability to care for others, it was not clear that the 2-1-1s generally had prepared to care for their own staff members during a crisis. Most efforts in that direction seemed spontaneous rather than planned in advance.

- In Lee County, after Frances, the United Way asked the Southwest Florida Addiction Center, that provides United Way’s Employee Assistance Program, to come in and meet with the staff to debrief and process. During this session, staff shared experiences related to the storms. This dialog also led to discussion on coping techniques. Staff were also informed of other available resources available through the EAP should they want additional counseling. Staff also received time and a half pay for extra hours worked during and after the storms. In exchange for working on a holiday day, staff received another day off.
- In Palm Beach County, Susan Buza arranged for a masseuse to come in and give staff neck massages after they had worked long stressful hours during the storms. Those who worked at the EOC for 24-hour periods received time and a half pay and some compensatory time off.

- At the Crisis Center of Tampa Bay, staff was given hazard pay during the time they were on site during the storm.
- The board of 2-1-1 Tampa Bay Cares gave its staff a day off.
- At 2-1-1 Brevard, all staff received a one-week pay bonus from the board of directors in recognition of “outstanding performance in difficult circumstances.”

It likely was coincidental that Debra Harris at the Crisis Center of Tampa Bay and her colleague, Sandra Charbonnier, at the Citizen Action Center of Hillsborough County (Tampa) were in synch when Sandra said of her staff, “For awhile, we were existing on sugar” and Debra advised, “Lay in lots of chocolate!”

Taking care of one’s staff is, of course, a serious issue. Even in situations where a staff person’s own life is not directly affected by an emergency situation, the requirement that they deal with a constant stream of people whose lives have been significantly disrupted can wear on them. It was clear from the interviews that front-line staff had a difficult time handling both the work load and the stress that came with the sheer volume of problems and with inevitably being unable to help some of the people because of a lack of resources in the community.

A challenge for 2-1-1s is to think through, in advance, how to provide appropriate support for their staffs, through facilitated debriefings, availability of counselors, and feedback on the affect of their work as well as by providing extra pay and time off.



People Interviewed for this Study

Brevard County

At 2-1-1 Brevard

- * Libby Donoghue, Executive Director
- Judi Leggett, 2-1-1 Counselor
- Lakesha McLaughlin, Community Resource Coordinator
- Jim Wilder, 2-1-1 Counselor

Others

- Don Lusk, Assistant County Manager for Human Services, Brevard County
- Rob Rains, President, United Way of Brevard County

Charlotte County

At the Information and Referral Division, Charlotte County Human Services Department

- Christie Allen , Information & Referral Specialist
- Claudette Baines , Elder Helpline Outreach Coordinator
- Elizabeth Beckworth , Database Manager
- Maria Conrado, Information & Referral Specialist
- Sharon deLorenzo , Senior Employment trainee
- * Joy Duperault, Supervisor, Information and Referral Division
- Diane Elliott, Information & Referral Specialist
- Terry Vail, Information & Referral Specialist

Others

- Joan LeBeau, Planner, Charlotte County Community Development Department
- Dale Phillips, Project Coordinator, Charlotte County Sheriff's Department
- Kelly Studenwalt, Assistant Director, Charlotte County Human Services Department

Lee County

At United Way of Lee County

- Nicole Nelson, I&R Specialist, United Way 211
- * Linda Pankow, Program Manager, United Way 211
- Cliff Smith, President

Others

- Matt Recommier, 911 Coordinator, Lee County Sheriff's Office

Orange County

At 2-1-1 Community Resources, Inc.

El Cabrel Lee, Vice President
Tino Paz, Director of Information Resources
George Wolfenden, Shift Supervisor

Others

Jerry Demings, Director of Public Safety, Orange County
John Hawkins, CEO, Heart of Florida United Way
Emery Ivery, Senior Vice President, Heart of Florida United Way
Patty Maddox, President and CEO, Winter Park Health Foundation (Board Chair, 2-1-1 Advisory Board)
Joan Nelson, Director of Research, University of Central Florida/Heart of Florida United Way

Palm Beach County

At The Center for Information & Crisis Services, Inc. (2-1-1)

* Susan K. Buza, Executive Director
Rene Favreau, I&R Specialist
Bruce Greenstein, Network Systems Coordinator
Elise Powell, Director, Call Center Operations
Jesus Rodriguez, Human Services Research Specialist
Demetra Russell, I&R Specialist
Latanya Russell, I&R Specialist

Others

Scott Badesch, Chief Professional Officer, United Way of Palm Beach County
Becky Gregory, Director, Palm Beach County Human Services Division
Paul Milleli, Director of Public Safety, Palm Beach County
Marilyn Munoz, District Manager, Department of Children and Families, District 9
Kasha Owers, Chief Operating Officer, Area Agency on Aging
Jim Vocsjik, Executive Director, United Way of Martin County

United Way of America

David Albritton, Vice President, Field and Media Communications
* Peter Bishop, Manager, 2-1-1
Trisha Ferrell, Lead Associate, 2-1-1
Kelly Levy, Director, 2-1-1
Tamara Schomber, National Director, Crisis Preparedness & Response

Telephone Interviews

- * Robert E. Arnold, Director, United Way 2-1-1, Jacksonville
- * Susan Byrne, President and CEO, 2-1-1 First Call for Help of Broward, Ft. Lauderdale
Sandra Charbonier, Manager, Citizen Action Center of Hillsborough County
Tim Closterman, Volunteer Services Manager, Pinellas County
Cynthia Fox, Executive Director, 2-1-1 Tampa Bay Cares, Largo
- * Peter Foy, Vice President, Community Initiatives, United Way of Marion County First Call for Help, Ocala
- * Ted Granger, President, United Way of Florida
Janet Bard Hanson, Director of Management and Information Programs, 2-1-1 Big Bend, Tallahassee
Debra L. Harris, Director, 2-1-1 and Hotline, Crisis Center of Tampa Bay, Tampa
Adraine LaRoza, Executive Director, Volunteer Services of Manatee County, Inc.
Ande Miller, Executive Director, National Voluntary Organizations Active in Disaster
Jane Morgan, American Red Cross, President National Voluntary Organizations Active in Disaster
- * Randy Nicklaus, Executive Director, 2-1-1 Big Bend, Tallahassee
Stephanie Radtke, Volunteer Services Coordinator, 2-1-1 Tampa Bay Cares
Susan Senkarik, Director of Community Impact, United Way of Escambia County
Shari Sinwelski, Director of Hotline Programs, 2-1-1 Big Bend, Tallahassee
- * Alberto Suarez, Executive Director, United Way 2-1-1 of Manasota, Inc.
- * Tim Sylvia, Director, First Call for Help, United Way of Volusia and Flagler Counties, Daytona Beach
- * Micki Thompson, Program Manager, 2-1-1 Tampa Bay Cares, Largo
Sharon Tierra, Project Manager, Vermont 2-1-1
Terry Worthington, President, United Way of Central Florida
Alex Young, President, United Way of Sarasota County
Jennifer Yunker, Voluntary Agency Liaison, Region 1, FEMA
- * Jan Zak, I&R Program Director, United Way Information and Referral, Gainesville

Participants in FLAIRS Meeting

People marked above with an asterisk [*] plus the following:

Bonnie Baker, Vice President and Chief Operating Officer, Florida Children's Forum
Madeline Franco, First Call for Help Coordinator, United Way of Marion County, Inc.
Gretta Jones, Government Operations Consultant, Florida Department of Elder Affairs
Roy McBean, Board Chair, United Way 2-1-1 of Manasota
Dennis Ross, CEO, Crisis Center of Tampa Bay
Brett Slocum, Information & Referral Specialist, United Way 2-1-1 of Lee County
Alan Zak, Information Technology Consultant, United Way of North Central Florida, Gainesville

About the Author

This report was researched and written by Dr. Kenn Allen, President of the Civil Society Consulting Group LLC in Washington DC. Dr. Allen has been actively involved since early 2002 in the development of 2-1-1 around the country. He has led state strategic business planning processes for 2-1-1 in Florida, Texas, Washington, and Oregon and is currently doing so in New York City, Northern Virginia, and the states of Rhode Island, Michigan and Minnesota. He also has worked with 2-1-1s in Indiana, Illinois, and Ohio. In 2003, he researched and wrote “The Essential Attributes of a Community Impact United Way” for United Way of America. He can be reached at kenn@civilsociety.biz.



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ATTACHMENT EIGHT

FEMA Recovery Division 2005 Hurricane Season After-Action Report

**PREPARED FOR
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RECOVERY DIVISION
U.S. DEPARTMENT OF HOMELAND SECURITY
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JUNE 26, 2006

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Appendices

A. Acronyms and Abbreviations

This appendix includes a list of all the acronyms and abbreviations used in this document.

B. Questionnaire Data

This appendix includes raw data from the online questionnaire, including unedited comments by questionnaire participants/respondents.

C. Interview Data

This appendix includes the scripts and notes from the various interviews, but does not include the name of the interviewee, in an effort to preserve confidentiality.

C-1 Interview Scripts

C-2 Interview Results

D. Conference Data

This appendix includes several issue templates for each program area as reported out at the end of the April After-Action Conference. The issue templates include the issue statement, causes, effects, and proposed short- and long-term solutions.

E. Initial Recommendations

2005 Hurricane Season After-Action Report

EXECUTIVE SUMMARY

On August 29, 2005, after affecting nearly \$2 billion in damage and 14 deaths as a Category 1 storm in Florida, Hurricane Katrina slammed into the Gulf Coast as a dangerous Category 4, taking more than 1,800 lives¹, causing more than \$115 billion in damages, and launching the largest natural disaster response and recovery effort in United States history. More than one million Louisiana, Mississippi, and Alabama residents were displaced as a result of the hurricane, requiring feeding and sheltering operations on a scale never before seen, including the provision of millions of meals ready-to-eat and massive relocations and sheltering for hundreds of thousands in multiple states throughout the country.

FEMA's Katrina response began in earnest on August 25. Shortly thereafter, the Regional Response and National Response Coordination Centers ramped up to prepare for the storm's first and second landfalls and coordinate an extremely multifaceted and complicated response effort. The storm's challenges continued during the recovery phase. As the fall and winter wore on, Hurricane Katrina's aftermath presented many unique challenges, from the complexity of conducting Public Assistance debris removal operations on such a large scale to the provision through Individual Assistance of hotel rooms to hundreds of thousands of evacuees to the difficulty of providing enough trained Community Relations staff members to meet the demand for their services.

The purpose of this after-action report is to examine how FEMA addressed the challenges wrought by Hurricane Katrina as they relate to response and recovery. The magnitude of this disaster meant that unique problems arose and spur-of-the-moment innovative solutions had to be developed or programs adapted to be appropriate for an effort of this scale. While the response presented many successes, the lessons to be learned pertaining to catastrophic disaster response are many. This internal FEMA Recovery Division report aims to identify and address the challenges revealed by Hurricane Katrina to ensure that FEMA continues to improve its disaster response as the 2006 Hurricane Season begins.

The After-Action Report Process

In an effort to assess its performance, FEMA tasked an outside contractor to gather data from FEMA employees, contractors, other Federal agency partners, non-governmental partners, and others who had been involved in the Hurricane Katrina response. Data was collected for the period from several days prior to landfall to approximately three months thereafter.

Information was gathered in three different ways—through an online questionnaire available to thousands who had participated in the response, targeted interviews with key individuals in all FEMA Recovery Division program areas, and an After-Action Review Conference where individuals met in subject area groups to identify and address some of the challenges posed by Hurricane Katrina. Both statistical and qualitative data were

¹ Over 1,800 more are still officially considered missing.

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collected through the online questionnaire and the interviews and this information was used to identify, analyze, and synthesize issues to be discussed at the conference.

Issues and Recommendations

Input generated through the survey, interviews, and conference naturally generated both area-specific issues and recommendations, but also revealed some concerns that were systemic and affected programs throughout FEMA. This report presents these broader issues and those that cut across program areas, as well as issues that are unique challenges within a particular program area.

The broad issues had a particularly devastating impact on the effectiveness of response and recovery as they were spread across nearly all programs. Survey and interview input revealed numerous systemic issues, including:

- The adequacy of staffing levels;
- Staff training and emergency management experience;
- The effectiveness of Recovery Division organization;
- The implementation of the National Incident Management System (NIMS) and the Incident Command System (ICS) within recovery operations;
- Management for the Governor-to-Governor Initiative;
- Policy generation and implementation processes; and
- Implementation of the National Response Plan (NRP).

FEMA faced several larger challenges during the Katrina response, including the need to adapt to new and untested structures, plans and relationships while conducting a major disaster response. In addition, the limited capabilities and capacities of the disaster response and recovery systems to meet disasters that are catastrophic in nature proved to be a trial. Finally, recurring issues surrounding program implementation, but not necessarily attributable to the magnitude of Hurricane Katrina, hindered the response and recovery when quick decisions and prompt program execution were required.

2005 Hurricane Season After-Action Report

1. INTRODUCTION

This After-Action Report outlines the lessons learned by the FEMA Recovery Division during the 2005 Hurricane Season and makes relevant recommendations. It is a synthesis of information obtained from an online questionnaire (see Appendix B), telephone and face-to-face interviews (see Appendix C), and a conference (see Appendix D) with relevant FEMA, other Federal agencies (OFAs), State, non-governmental organizations (NGOs), and other partners.

1.1. QUESTIONNAIRE

The questionnaire was made available online to all Recovery Division program staff and partners between February 27 and April 28, 2006. All responses were completely anonymous and the information provided will not be attributed to specific individuals, though general demographic information was obtained. Of those respondents providing demographic information, 35 percent were Regional FEMA staff (Permanent Full-Time [PFTs] and Disaster Assistance Employees [DAEs]) and 23 percent were contractors. Approximately 10% identified themselves as being from Headquarters (HQ—7%), states (2%), or voluntary agencies and NGOs (1%). The remainder identified themselves as “Other Federal” (17%) or “Other” (16%—e.g., National Processing Service Centers (NPSCs), local hire). A total of 917 people responded to the questionnaire—of whom 331 completed the entire questionnaire. The raw results of the questionnaire are provided in Appendix B.

Questionnaire respondents were asked to provide information for the period covering Katrina one week prior to landfall on the Gulf Coast to 85 days after landfall. Although the questionnaire frequently referred to the Katrina response time frame, the respondents were reminded that the time period also included Hurricane Rita Landfall + 60 days, as well as Hurricane Wilma Landfall + 30 days.

Respondents were asked to answer only those questions pertaining to the programs in which they worked during the Katrina response. Some questions required the respondents to rate the effectiveness of particular programs. The effectiveness scale provided was related to a program being able to achieve its intended purpose. The following scale was used to rate effectiveness:

- Highly effective—exceeding the goals of the program to meet applicant needs.
- Effective—meeting the goals of the program to meet applicant needs.
- Somewhat ineffective—not meeting some of the goals of the program to meet applicant needs.
- Ineffective—not meeting the goals of the program to meet applicant needs.

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Respondents were also asked to indicate what factors were helpful or hindering to the effectiveness of the program:

- Helpful—facilitating effective accomplishment of program goals.
- Hindering—impeding effective accomplishment of program goals.

Respondents were provided the opportunity to explain why some program aspects were effective or ineffective and how the factors affected program goals and accomplishments. These comments as well as the percent responses for multiple-choice questions (described above) are provided in Appendix B.²

1.2. INTERVIEWS

A pre-selected group of 144 managers and participants in Recovery Division's Katrina operations were interviewed via telephone and in person between February 27 and March 24, 2006, for more in-depth observations, with a focus on identifying the most successful innovations and the most problematic program elements. The interviews were intended to fill in any potential gaps not covered by the questionnaire. The questions were aimed at isolating and defining issues. Although interview scripts were prepared (see Appendix C-1), interviewers were not required to follow the scripts exactly. They were simply used as a guide to assist interviewers in obtaining the most useful information and interviewers were encouraged to deviate from the scripts as appropriate as issues arose during the interview.

Comments from the interviewee were subsequently entered into a database and were cataloged by program areas—e.g., Individual Assistance (IA), Public Assistance (PA), Community Relations (CR)—and program elements (e.g., management, planning, training) to help analyze the data. Appendix C-2 presents the cataloged interview comments. Please note that a comment may be attributable to more than one program area and/or more than one program element.

1.3. CONFERENCE

The information obtained through the questionnaire and interviews was compiled and analyzed, and the major issues were synthesized and presented by program area (e.g., PA, IA) at the FEMA Recovery Division After-Action Conference, which was held in Lansdowne, Virginia, on April 4-6, 2006. Each program area was presented with the relevant identified issues and was tasked with refining the issue statement, noting the causes and effects of each issue, and providing short- and long-term recommendations to address the issue. This information was recorded for each issue addressed at the conference and is provided in Appendix D.

² Note that in Appendix B the percent response includes the "I don't know" option; whereas, percent calculations provided in the report do not include the "I don't know" option.

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There was not enough time during the conference to discuss each issue identified; however, all issues and recommendations identified from the questionnaire, interviews, and conference are provided in this report, as well as any additional recommendations from SRA.

2005 Hurricane Season After-Action Report

2. STORM AND DECISION NARRATIVE

2.1. PREFACE

In May 2005, before hurricane season had even begun, the National Oceanic and Atmospheric Administration (NOAA) and the National Weather Service (NWS) predicted a record-breaking season for 2005 with 12 to 15 tropical storms, of which seven to nine were predicted to become hurricanes, and three to five of which could become major hurricanes. Three months later, on August 2, NOAA and the NWS continued to forecast a 95-100% chance of an above-normal hurricane and tropical storm season.

Of the 12 named storms and 3 hurricanes that developed during the 2005 season prior to Katrina, three impacted the U.S. (Arlene, Cindy, and Dennis).³ The season started early with Tropical Storm Arlene forming on June 9 and making landfall near Pensacola, Florida on June 11. With sustained winds of approximately 60 mph, it caused little damage.

Hurricane Cindy made landfall near Grand Isle, Louisiana on July 5. With maximum sustained winds of near 75 mph, a Category 1 hurricane, Cindy caused heavy rainfall and inland flooding as it tracked northeastward across the eastern U.S., weakening to a tropical depression and ultimately dissipating.

Hurricane Dennis reached Category 4 strength on July 8/9 and hit the Florida Panhandle and the Alabama Coastline on July 10 as a Category 3 storm, activating the first hurricane response of the 2005 Hurricane Season, though the response to Dennis failed to even hint at the magnitude of things yet to come. Wind speeds were approximately 120 mph at the time of landfall and led to more than 400,000 power outages along the coast and inland in Mississippi, Alabama, and Georgia. Heavy rainfall also resulted from the storm leading to localized flooding in parts of the Southeast. Partly as a result of rainfall associated with both Cindy and Dennis, Alabama and Georgia ranked the 5th wettest on record for the month of July.

As the season wore on, FEMA's Recovery Division, and the IA program area in particular, began to ramp up for the more dangerous months of late summer and early fall by conducting an IA Steering Committee to hash out policy items identified during the 2004 season in preparation for 2005, including matters surrounding housing, applicant privacy and other issues. Immediately following the Steering Committee was a full-scale IA Conference, which drew participants from all FEMA Regions, FEMA HQ, other Federal agency partners and non-governmental organizations active in disaster response. The conference, which took place a mere week before Katrina's landfall, was valuable in improving the buy-in of the stakeholders and to make sure they were all on the same page as the most devastating natural disaster in U.S. history was about to unfold.

³ Information regarding Arlene, Cindy, and Dennis is from NOAA.
<http://www.ncdc.noaa.gov/oa/climate/research/2005/hurricanes05.html#arlene#arlene>.

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What eventually became Hurricane Katrina formed off the coast of the Bahamas on August 23 and was dubbed by the NWS as Tropical Depression (TD) Twelve. Soon after, a tropical storm watch was issued for portions of the Florida Keys and Florida's Atlantic coastline. By August 24, TD Twelve had strengthened into Tropical Storm Katrina, the season's eleventh named storm, which spurred FEMA to activate and deploy its Hurricane Liaison Team to the National Hurricane Center (NHC). FEMA's Region IV was also poised to assist in Georgia or Alabama, as needed.

In preparation for the storm's landfall on the Florida coast, FEMA pre-positioned 100 truckloads of ice, 35 truckloads of food, and 70 truckloads of water in Georgia. Additional preparation included pre-staging 400 truckloads of ice, nearly 200 truckloads of food, and over 500 truckloads of water at logistics centers throughout Alabama, Louisiana, Texas, South Carolina, and other locations in Georgia.

2.2. FIRST LANDFALL AND PREPARATIONS (FLORIDA)

Thursday, August 25

By Thursday morning, Katrina had developed into a Category 1 hurricane with further strengthening forecast. At 10:00 a.m., FEMA issued a press release "encouraging Floridians to take the necessary precautionary measures for the looming storm."⁴ FEMA also conducted its first daily video teleconference that day in an effort to coordinate Federal, State, and local response and to ensure that assistance programs and support were available and on call.

FEMA's National Response Coordination Center (NRCC) Red Team was activated at a modified Level 2 and the NRCC Emergency Support Functions (ESFs) 1, 3, 4, 5, 7, 14, and 15 were activated, as was a military liaison. Also, the Regional Response Coordination Center (RRCC) in FEMA Region IV that had been active at Level 3 in Thomasville, GA was moved to Atlanta and upgraded to Level 2.

By approximately 6:30 p.m., Hurricane Katrina made its first landfall in Southern Florida as a Category 1 storm, inflicting billions of dollars in damages and taking 14 lives.⁵

2.3. SECOND LANDFALL (GULF COAST)

Friday, August 26

After striking Florida, Hurricane Katrina advanced into the Gulf of Mexico and rapidly began strengthening. FEMA Director Michael Brown warned Gulf Coast residents that Katrina could quickly become a Category 4 storm and that the potential strike zone for the more dangerous hurricane stretched from the Western Louisiana coast to the Florida Panhandle. Alabama's Emergency Operations Center (EOC) was activated and Kathleen Blanco, Louisiana's Governor, declared a state-level State of Emergency.

⁴ <http://www.fema.gov/news/newsrelease.fema?id=18417>.

⁵ <http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5509a5.htm>

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Saturday, August 27

Anticipating a landfall in Louisiana, President George W. Bush declared a Federal State of Emergency for the State of Louisiana, which allowed FEMA the authority to “identify, mobilize, and provide at its discretion, equipment and resources necessary to alleviate the impacts of the emergency.”⁶ The Louisiana and Mississippi EOCs were also activated and Mississippi Governor Haley Barbour declared a State of Emergency. Emergency Response Teams-Advanced (ERT-As) were activated and deployed to the Mississippi and Alabama EOCs, as well as Region IV’s RRCC in Atlanta.

The NRCC at FEMA HQ transitioned to 24-hour operations at Level 1 as the Emergency Management Assistance Compact (EMAC) was activated. Additionally, several more ESFs were activated, including ESF 2, ESF 6 led jointly by the American Red Cross (ARC) and the FEMA Recovery Division, and ESF 9. The RRCCs in Region IV and VI activated all ESFs.

In addition, supplies for the second landfall were pre-staged at Camp Beauregard in Louisiana and at the FEMA Logistics Center in Fort Worth, Texas, which included 540,000 liters of water; 680,000 pounds of ice; 15,120 tarps; 328,320 Meals Ready to Eat (MREs); and 102 trailers holding additional water and MREs. Also, 1,300 disaster assistance workers were pre-deployed to the area prior to landfall. Meanwhile, the Recovery Division readied approximately 40 CR staff and kept another 40 on call for deployment to Orlando to be deployed further where needed at a moment’s notice.

By 5:00 p.m., “contra flow” began on Mississippi and Louisiana highways to allow for more effective evacuation. Late on August 27, William Lokey was appointed the Federal Coordinating Officer (FCO) for Louisiana.

Sunday, August 28

On the heels of the previous day’s Presidential Declaration, FEMA issued a special announcement to “warn residents along Gulf Coast states to take immediate action to prepare for dangerous Hurricane Katrina as it approaches land.” In addition to the NRCC Red Team, which was activated for the first landfall, the Emergency Response Team-National (ERT-N) Blue Team was fully activated, as were Regions IV and VI.

Early in the day, a Presidential Emergency Declaration was issued for Mississippi, and William Carwile was appointed the FCO for that disaster, closely followed by another Emergency Declaration in Alabama, for which Ron Sherman was appointed FCO. Alabama Governor Bob Riley also declared a State of Emergency. By 5:00 p.m. contra flow ceased on Mississippi and Louisiana interstate highways.

Monday, August 29

FEMA continued preparations by pre-staging Rapid Needs Assessment Teams (RNATs) in Louisiana, Mississippi, and Alabama, while deploying nine Urban Search and Rescue (US&R) task forces and Incident Support Teams (ISTs) from Florida, Indiana, Maryland,

⁶ <http://www.fema.gov/news/event.fema?id=4808>

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Missouri, Ohio, Tennessee, Texas, and Virginia. Additionally, 31 National Disaster Medical System (NDMS) teams were deployed to staging areas in Anniston, Memphis, Houston, Dallas, and New Orleans, which included 23 Disaster Medical Assistance Teams (DMAT's). Also as part of NDMS, FEMA deployed two Veterinary Medical Assistance Teams (VMAT's) to support pet rescue and medical care.

Just after 7:00 a.m., Hurricane Katrina made its second landfall, hitting Southeast Louisiana as a dangerous Category 4 storm. Within two hours came the first report of levee breaches, and New Orleans began to flood. In response to the destruction, President Bush issued Major Disaster Declarations (FEMA-1603-DR-LA, FEMA-1604-DR-MS and FEMA-1605-DR-AL) for Louisiana, Mississippi, and Alabama, respectively, to increase the Federal funding available by triggering the provisions of the Stafford Act. Additionally, the declarations freed up FEMA IA and PA program funds for selected counties and parishes.

FEMA Director Brown also requested an additional 1,000 Department of Homeland Security (DHS) employees to be available within 48 hours of landfall and 2,000 within seven days to serve as CR liaisons. The requested volunteers were to establish positive working relationships with affected communities and residents, make referrals as needed, identify potential community issues requiring attention, convey a positive image of disaster operations to government and the public, and perform outreach to community leaders to detail available Federal disaster assistance.

FEMA's National Processing Service Centers (NPSCs), which field applicant calls, were fully operational and staffed with more than 1,150 operators to register disaster victims for assistance and provide referrals to other services. In the week immediately prior to landfall, 426 agents were trained to enhance their capability for the burgeoning 2005 Hurricane Season.

Finally, to address the mass care needs of the evacuated population, shelters were opened in several states. ESF 6 reported between 30,000 and 52,000 sheltered on August 29 residing in the following states:

- 38 facilities in Alabama
- 13 in Florida
- 68 in Mississippi
- 11 in Texas
- 74 in Louisiana

Other agencies quickly became involved to assist disaster victims. ARC provided vouchers to allow evacuees to move out of congregate care shelters and into hotels and motels. While this program is customary, it was being offered in larger numbers than ever before as a result of the impact of Hurricane Katrina. The Internal Revenue Service (IRS) provided 600-650 personnel, as requested by FEMA, to staff their call centers for tele-registration.

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2.4. POST-LANDFALL

Tuesday, August 30

In light of the previous day's events, DHS Secretary Michael Chertoff declared Hurricane Katrina an Incident of National Significance and appointed FEMA Director Brown as the Principal Federal Official (PFO) in charge of the response. The purpose of the PFO was to provide a primary point of contact for Federal disaster response in the area, as well as to increase local awareness, act as a channel for media and public communications, and interface with government officials at all levels.

Additionally, FEMA requested Department of Defense (DOD) assets, such as ships and helicopters, including the Navy amphibious assault ship USS Bataan. The Navy also indicated that several other ships, including a rescue and salvage vessel, as well as the USS Iwo Jima, were on their way from Norfolk, VA. The USNS Comfort, a Baltimore-based floating hospital with surgical capability and a large number of beds, also planned to depart, staffed by a medical crew from the National Naval Medical Center of Bethesda, MD.

Throughout the day, the movement of supplies into the affected area continued, including water, ice, MREs, generators, tents, tarps, and associated equipment. More DMAT's, US&R task forces, and ISTs were sent in while others were also being readied for deployment. FEMA also began to circulate a memo throughout DHS to request personnel to fill key roles in CR and IA to supplement staff already in the field as part of the response.

Wednesday, August 31

FEMA's priorities 48 hours after landfall included meeting the immediate life-saving and life-sustaining needs of the affected population. To accomplish this, FEMA was coordinating one of the largest mass mobilizations in U.S. history for search and rescue efforts, emergency housing, feeding, and medical care.

Agencies across the Federal government were feverishly working to address critical needs. FEMA's Recovery Division was working with a multi-state housing task force to address potential continued sheltering and eventual longer-term housing needs. US&R task forces had been working in Louisiana and Mississippi, joined by eight swift water teams from California, which brought total search and rescue personnel to more than 1,200. Fifty-one NDMS teams had been deployed. Additionally, the Department of Transportation (DOT) and the Louisiana National Guard had mobilized to support logistics and security, respectively, as well as the movement of evacuees to the Houston Astrodome. DOT also supported a team of 66 transportation experts to complete damage assessment on the highways, railroads, airports, transit systems, ports, and pipelines, as well as support detour planning and critical system repairs to get the population moving once again.

ESF 6 at FEMA HQ also requested 800 DOD personnel to assist with feeding and sheltering victims in Louisiana and Mississippi. Forty-eight hours after landfall, more

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than 54,000 people were housed in 317 shelters and already more than 82,000 meals had been served. Meanwhile, the Recovery Division had procured 20,000 manufactured housing units for approximately \$1 billion to address longer-term needs and planned to buy another 100,000 units. It also purchased 30 office trailers for use in implementing IA field operations due to the lack of available facilities in the impacted area.

Thursday, September 1

Federal disaster operations for Alabama transferred from the Region IV RRCC to a Joint Field Office (JFO) in Montgomery. Additionally, the Regional Area Command (RAC) was established to coordinate policies and efforts across the impacted states. Though it was based on a National Incident Management System (NIMS) concept of an area command, in practice the concept was quickly abandoned due to its staffing requirements and the need to address some issues in state-specific ways.

To marshal the personnel and resources to begin fulfilling evacuee needs and rebuilding communities, FEMA announced guidelines for contractors interested in doing business with the department.⁷ Contractors hired to inspect damaged property also began returning data to the NPSCs to expedite the payment of IA funds to eligible applicants. Because of insufficient FEMA staff, IA Technical Assistance Contractors (IA-TACs) began to be utilized to address Mass Care tracking and program requirements at FEMA HQ and to establish Disaster Recovery Centers (DRCs). Plans were also initiated to activate IA-TACs to supplement U.S. Army Corps of Engineers (USACE) damage assessments. Also, FEMA HQ continued to work with deployment administrators to ensure that its own staff was being efficiently utilized and that JFO resource requests were met.

Several states began to offer to take in displaced persons, and the FEMA Office of General Counsel (OGC) began to work with these State governments to negotiate their offers. An agreement was also reached with the ARC to provide for FEMA to cover the hotel costs incurred by storm victims in the Transient Accommodations (TA) program either under Section 403 or 408 of the Stafford Act, which involve different funding streams and eligibility requirements. The NPSCs also moved to 24-hour service and the IRS call centers continued to operate at full capacity.

To manage an influx of donations, FEMA held meetings with the DHS Private Sector Office, which culminated in an agreement to streamline the receipt of offers through the Web-based National Emergency Resource Registry (NERR—www.nerr.gov or www.swern.gov). Meanwhile, referrals were also being made to the National Voluntary Organizations Active in Disaster (NVOAD); donors were strongly encouraged to give cash. All manner and size of donations were being received, from a few dollars here and there to multi-million dollar corporate contributions of goods and services. A toll-free number and call center were established to begin operations the following day at FEMA HQ.

⁷ <http://www.fema.gov/news/newsrelease.fema?id=18518>

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Friday, September 2

To support the states offering to take in evacuees from the affected areas, the first Emergency Sheltering Declarations were issued for states not directly impacted by the storm, including Arkansas and Texas. These Declarations would be issued to nearly every state over the next four weeks to support funding for sheltering provisions in multiple locations. Other State and Federal agencies were also coordinating with FEMA to provide commodities such as food, water, fuel, and ice to the affected area. In addition, FEMA distributed 30 million MREs.

As the ESF 14 (Long-Term Community Recovery) lead, FEMA worked with other State and Federal officials to develop long-range plans for Gulf Coast recovery. Initial plans included the development of temporary housing for several thousand New Orleans residents. At this point, ESF 6 was also coordinating with the Department of Housing and Urban Development (HUD) to support housing requirements. HUD also announced its disaster assistance programs aimed at addressing the anticipated housing needs of the affected population.

Saturday, September 3

FEMA Director Brown announced that Federal aid had been made available to the State of Texas to supplement its momentous efforts to assist evacuees. FEMA also purchased 30 mobile DRCs and requested additional production of the units for future purchases.

By this point, the shelter population had reached more than 135,000 in nearly 500 facilities, and air evacuations had commenced in earnest, moving approximately 10,000 people a day out of the affected area. The FEMA FCO Cadre assigned to New Orleans coordinated with the National Guard and receiving states to expedite this movement, which was the largest emergency domestic airlift in U.S. history.

Due to clogged phone lines and ever-increasing demand for services, FEMA augmented the existing NPSC capability with two additional contract call centers.

Sunday, September 4

As future housing needs became clearer, FEMA announced a \$236 million, six-month contract with Carnival Cruise Lines for use of three of their ships: the Ecstasy, the Sensation, and the Holiday. These ships housed the elderly, special-needs victims, and families with small children who were residing in shelters at that time.

By this point, nearly 12,500 evacuees were being housed at the Houston Astrodome, the largest congregate shelter, and the overall population was 151,409 in 563 shelters spread across ten states. Additionally, FEMA reported that 44,000 people had relocated internally within Louisiana; 237,000 to Texas; 10,000-15,000 to Tennessee; and 3,000 to Arkansas. Also by this point, the Recovery Division had received more than 10,000 charitable offers through NERR and state donations. Volunteer coordination hotlines had been activated in both Alabama and Mississippi.

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Monday, September 5

To assist Brown as the PFO, DHS appointed Vice Admiral Thad Allen as Deputy PFO in New Orleans. At FEMA HQ, the IA management cell initiated a strategy to address evacuee needs that included deploying teams to register evacuees, activating expedited financial assistance, facilitating the relocation of evacuees out of the heavily-impacted area, and establishing a gradual transition from special procedures to standard operating procedures (SOPs) and program implementation.

At the Astrodome, 150 FEMA inspectors were in place, preparing to register evacuees. AT&T had also set up a phone bank there for evacuees to register themselves. By mid-week, 550 additional personnel were to be deployed in 200 teams to the Dallas Convention Center and 350 teams to large shelters in Mississippi and Alabama to assist with registration. Two more DRCs were also opened in Mississippi. Finally, PA disbursed \$102 million for Category B emergency protective services.

Tuesday, September 6

A week after landfall, many evacuees were struggling financially and the allocation of some cash assistance hinged on determining individuals' eligibility, so FEMA commenced the allocation of Expedited Assistance (EA), which authorized \$2,000 for eligible households under the housing assistance component of the Individuals and Households Program (IHP). In coordination with the Department of the Treasury, it would provide debit cards for many displaced persons who were unable to provide account information to enable a standard electronic funds transfer (EFT). The first cards, however, were not actually received until September 9. Evacuees were permitted to use it in whatever manner they deemed fit and did not have to account for its expenditure.

The Hurricane Katrina "Blue Roof" Program was announced under PA.⁸ Blue Roof provided plastic roof sheeting and installation through the USACE to mitigate further home damage and allow as many residents as possible to remain in their dwellings. The Recovery Division decided upon and provided the criteria for establishing DRCs to the Focus and states. In this disaster, the shortage of personnel to staff DRCs and provide the necessary local, State, and Federal services presented an obstacle to optimum functioning of the DRCs. Additionally, because of insolvable deficiencies in facility suitability, mobile DRCs were deemed the most effective option in many locations. IA reported that five DRCs were opened in Louisiana in conjunction with the State.

ESF 6's primary emphasis at this point was stabilizing shelter operations and food distribution in the State of Louisiana, where the demand was extremely high. Also, emergency group travel-trailer sites were being located in Mississippi.

In response to gubernatorial requests, the Recovery Division outlined an interim policy for designating counties for IA funding before damage assessments had completely validated the impact. This would allow repairs to begin earlier. Additionally, Disaster Specific Guidance (DSG) #1 was disseminated to "clarify procedures to be followed by each JFO in the proper notification for projects greater than one million dollars as

⁸ http://www.fema.gov/txt/rt/rt_100505.txt

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required by the Stafford Act.”⁹ These clarifications were made to expedite the disbursement of funds to applicants to enable them to fund restoration without forcing the affected local governments into bankruptcy.

Wednesday, September 7

FEMA continued to address the challenges of both temporary and longer-term housing in several ways. Along with DHS, FEMA worked with faith-based organizations to help place evacuees in housing resources available through those organizations. FEMA also benefited from ongoing U.S. Department of Agriculture (USDA) Rural Development housing assistance to evacuees and worked with the private sector to identify available rental properties.

FEMA HQ issued DSG #3, entitled “Hurricane Katrina Private Property and Debris Removal in Coastal Areas” to outline the procedures to be followed for debris removal from private property in the following areas:¹⁰

- Alabama: Baldwin and Mobile counties;
- Louisiana: Jefferson, Lafourche, Orleans, Plaquemines, St. Bernard, St. Charles, St. Tammany, and Washington parishes; and
- Mississippi: George, Hancock, Harrison, Jackson, Pearl River, and Stone counties.

Thursday, September 8

More than 500 travel trailers were in place on sites in the Gulf Region and ready for immediate occupancy, 200 of which were located in Slidell, Louisiana, to house displaced police and firefighters necessary to keep the area’s public safety capability operational. More than 2,800 more units were being prepared to be placed in Baton Rouge, and 3,500 were waiting to be deployed where required.

FEMA also announced its contracts with five major national corporations to speed emergency housing relief to Gulf Coast families. These contracts were administered by a new Housing Area Command (HAC) created to address the region’s most pressing problem, housing more than one million displaced residents. Nearly 165,000 Louisiana residents were currently in congregate care shelters and needed housing quickly. The HAC included FEMA, private sector contractors, and partners from HUD, USACE, and ARC. The HAC’s primary mission was to secure emergency housing for victims and develop longer-term plans.

Additionally, a hotline was activated in Louisiana to field calls offering donations and volunteers at the state level.¹¹

⁹ Nancy Ward, RAC Director, “Million Dollar Queue Notification for Hurricane Katrina,” DSG #1, September 6, 2005.

¹⁰ Nancy Ward, RAC Director, “Private Property Debris Removal in Coastal Areas,” DSG #3, September 10, 2005.

¹¹ Anecdotal evidence from After Action Review Conference.

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Friday, September 9

The Recovery Division accelerated its PA Infrastructure Program to assist public agencies with immediate and critical emergency repair needs. Assistance through this program would normally be delivered later in the recovery process to allow more time for evaluating the extent of public infrastructure damage, but the exceptional nature of the damage in this case revealed a need much earlier in the process for Hurricane Katrina. Infrastructure teams consisting of PA and support staff rapidly fanned out throughout the devastated areas to determine the need for repairs, and projects were identified through the Preliminary Damage Assessment (PDA) process. Under the repair program, eligible disaster-related costs were to be reimbursed to governments and certain nonprofit organizations providing essential services in the areas of emergency protective measures, debris removal, and restoration of public facilities.

To better meet the needs of states willing to host hurricane victims, FEMA adapted their Stafford Act capabilities to cover the cost of hosting the massive influx of evacuees, which could easily overwhelm local financial capabilities. Section 403 of the Stafford Act would be used until a longer-term strategy could be crafted to implement IA programs. DSG #2 was released to clarify the Federal financial responsibility for State emergency sheltering reimbursement, and applied not only to evacuation-related costs, but also to short-term sheltering, interim sheltering, and medical care, transportation, and EOC costs.¹² The first travel trailers were delivered to commercial sites in Mississippi on Friday as well.

Vice Admiral Allen was appointed as the PFO for Hurricane Katrina, replacing FEMA Director Brown as the head of hurricane relief operations. EFT and debit card EA continued to be disbursed—nearly \$460 million had been provided to individuals in the 48 hours since the program commenced. More than 230,000 eligible displaced individuals in all 50 states and the District of Columbia received the \$2,000 allotment. Debit cards were used primarily to target the largest shelter populations in Houston, San Antonio, and Dallas, while most others would receive their EA by EFT. Debit cards were not additional to EFT or postal checks, the third method of assistance delivery.

Saturday, September 10

Nearly two weeks after Hurricane Katrina devastated the Gulf Coast and the Federal government had launched an unprecedented relief effort:

- Nearly \$690 million in Federal aid had been distributed;
- More than 330,000 households had either received or been processed for a \$2,000 payment;
- More than \$315 million had been disbursed through the U.S. Postal Service (USPS);
- More than \$350 million had been disbursed through EFT;
- Nearly \$17 million in debit cards had been given to evacuees; and

¹² Nancy Ward, RAC Director, "Eligible Costs for Emergency Sheltering Declarations," DSG #2, September 9, 2005.

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- Families temporarily residing in all 50 states and the District of Columbia were receiving assistance.

DHS streamlined procedures for debris removal to expedite the return of properties to livable conditions and eliminate threats to public health and safety. Also part of the effort to provide more housing and shelter, two cruise ships arrived in New Orleans with a primary mission of housing both disaster victims and first responders or essential recovery personnel.

Monday, September 12

FEMA Director Brown announced his resignation as Under Secretary and President Bush named R. David Paulison, a 30-year fire and rescue veteran and former FEMA Preparedness Director, as FEMA's Acting Director.

FEMA also announced that State and local governments in 22 declared Alabama counties would be reimbursed for 100% of Hurricane Katrina eligible debris removal costs incurred in the first 60 days after President Bush's August 29 disaster declaration for Alabama. FEMA PA also stated its intent to reimburse local governments for all approved emergency protective measures, including police overtime, incurred in the same period. After the initial 60 days, the funding formula would refer to the standard 75% Federal, 25% non-Federal cost-sharing arrangement.

IA applicant services also changed significantly on September 12. Debit card distribution was halted, although EA would still be available through either EFT or a Treasury check. ESF 6 continued work on transitioning evacuees from shelters to temporary or interim housing with an initial target date for all transitions to take place by October 1, 2005. However, the transition process was notably slowed by a low return rate for inspections. To address this issue, FEMA allowed inspections to be performed without the applicant being present at the time.

2.5. INITIAL RECOVERY

Wednesday, September 14

FEMA established an auto-dialer service at the NPSCs to generate automated calls to inform applicants when their applications had been received. This reduced the volume on the already overburdened Helpline.

Thursday, September 15

To address the Helpline volume issues, the NPSCs doubled their capacity to take applications via the Internet. To reduce duplicate applications, FEMA also implemented a script in the application to acknowledge if a particular social security number had already been used for registration.

Friday, September 16

IA determined that the fixed EA of \$2,000 would not be considered a duplication of benefits with Temporary Housing Assistance (THA) and would not, therefore, be subject

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to recoupment. This decision had the effect of lessening the required volume of casework, allowing more focus on streamlining and processing the numerous claims while avoiding the public perception that bureaucracy took precedence over applicants' welfare.

Saturday, September 17

Federal operations for Mississippi began to transition from the RRCC to the JFO in Jackson.

Sunday, September 18

Mike Bolch replaced Ron Sherman as FCO for DR 1605 in Alabama.

Monday, September 19

The JFO in Jackson, MS, became fully operational. Additionally, FEMA authorized assistance for those households who became geographically separated as a result of the disaster. This allowed THA funds to be allocated to multiple applicants within a household as long as those people were displaced to different areas by the storm. This decision was illustrative of FEMA's flexibility in changing policies to deal with the unique circumstances of this catastrophic event.

IA also announced that the cost for transportation or housing associated with hosting evacuees incurred by an individual, family, or group would not be reimbursable under IHP. Additionally, FEMA released reminders that evacuees were potentially eligible for additional aid through State and local governments and voluntary agencies.

FEMA HQ also published DSG #5 pertaining to the lease of warehouse space to house donated goods. The guidance specifically allowed State governments to "enter into leases to support the storage and distribution of donated goods" for six months with possible extensions thereafter.¹³ This decision alleviated an important pressure point for states where donated goods were piling up.

Tuesday, September 20

IA announced free crisis counseling for disaster victims under Section 416 of the Stafford Act, which allowed FEMA to fund mental health assistance and training in declared disaster areas. The counseling primarily took the form of short-term interventions, and delivery was largely achieved through face-to-face outreach to applicants themselves.

Wednesday, September 21

Vice Admiral Allen was appointed FCO for Louisiana, Mississippi, and Alabama, making him the first ever PFO-FCO. Additionally, the Small Business Administration (SBA) announced once again that it would provide home disaster loans to homeowners and renters, not solely to businesses, with hurricane damage.

¹³ Libby Turner, RAC Chief, "Leasing of Warehouse Space for Donated Goods," DSG #5, September 19, 2005.

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Friday, September 23

In conjunction with HUD, FEMA announced a comprehensive transitional housing assistance program for Katrina evacuees. The measures instituted were designed to accelerate the delivery of Federal housing assistance to allow evacuees a greater measure of stability and flexibility while housing options were being reestablished in the Gulf Coast area. Those evacuees not eligible for IHP were informed that they may still be eligible for HUD's Katrina Disasters Housing Assistance Program (KDHAP).

Saturday, September 24

Hurricane Rita made landfall in Texas and Louisiana as a Category 3 storm, compounding the difficulty of Katrina response and recovery efforts.¹⁴ Alexander S. Wells (Scott Wells) was appointed the new FCO for the affected area, replacing Vice Admiral Allen.¹⁵

Sunday, September 25

IA clarified the registration process and eligibility for evacuees impacted by both Hurricane Katrina and Hurricane Rita to guarantee that needs resulting from both were met while still ensuring that replacement housing, for example, was not duplicated.

Monday, September 26

FEMA halted EA for Hurricane Katrina, as the majority of affected households had already registered, 75% of which had already received EA. At this point, FEMA had awarded more than \$1.6 billion in EA to 803,088 applicants in three affected states. Additionally, FEMA continued efforts to move evacuees from congregate care shelters into other forms of housing. According to ESF 6, approximately 80,289 evacuees were housed in 853 shelters in 18 states by this date.

Wednesday, September 28

FEMA officially initiated THA rental payments in the amount of \$2,358 pursuant to Stafford Act Section 408. Applicants in the most heavily impacted areas of Louisiana and Mississippi received three months of rental assistance based on the national average of fair market rental (FMR) rates.

Inspection measures were approved to streamline damage verification within a more reasonable timeframe. Due to the magnitude and severity of the damage in some locations, and the inability of residents to return or, in some cases, for inspectors to visit, FEMA identified particular areas that would be verified using a combination of rapid needs assessment team information, map overlays, and Geographic Information System (GIS) data. This alternate method allowed much more assistance to be delivered to applicants in a much shorter time frame.

¹⁴ While this report focuses on Hurricane Katrina, it is necessary to mention Hurricane Rita inasmuch as it affects Katrina response and recovery efforts and available resources. In addition, many evacuees were affected by both storms.

¹⁵ <http://www.fema.gov/news/newsrelease.fema?id=19143>

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PA also provided guidance to simplify the administrative burden of segregating emergency protective measures costs between Hurricane Katrina and Rita, endorsing good faith efforts to attribute eligible costs to the appropriate declarations. This streamlined the process for States and localities to receive reimbursement.

Thursday, September 29

FEMA announced the Facilitated Relocation Program (FRP), consisting of three components:

- 1) **Family reunification:** Transportation would be provided for evacuees who were separated from family members during the evacuation process and who were residing in hotels, shelters, and motels in different locations and states. This option would be available through October 27, 2005.
- 2) **Interim housing in other locations:** Transportation would be provided for evacuees currently staying in shelters, hotels, and motels to interim housing in different locations through December 26, 2005.
- 3) **Returning to home state:** Transportation would be provided for evacuees to return to their home states from interim housing in other locations. This option would be available for up to 18 months after the date of declaration.

2.6. LONGER-TERM RECOVERY

Week of October 2 – October 8

FEMA clarified the policy pertaining to home inspections to allow evacuees located in Georgia, Kentucky, North Carolina, South Carolina, and Tennessee to have their homes inspected without being present. FEMA-contracted inspectors would contact residents who were due an inspection to set up a date and time and if applicants were not able to be present, they could identify another authorized agent to meet the inspector.

Jack Schuback, lead for the IA Management Cell at HQ, held the first large conference call (including more than 400 participants) on transitional housing. The call was sponsored by the National Law Center on Homelessness and Poverty, the National Low Income Housing Coalition, the National Alliance to End Homelessness, and the Enterprise Foundation.

FEMA elected not to use private sector universities and associates to assist in staffing long-term recovery. Additionally, a housing site/project review committee was established in an effort to carry out a systematic and efficient site evaluation process in Louisiana to speed up the placement of mobile homes and travel trailers (MH/TT). Finally, during this week, 100% funding for mission assignments (MAs) was extended to the USACE.

Week of October 9 – October 15

The Recovery Division established an alternative arrangement to ensure that PA complied with the National Environmental Policy Act (NEPA) requirements.

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Week of October 16 – October 22

ARC and FEMA established a contract for approximately \$250 million to reimburse the cost of sheltering and emergency pharmaceutical assistance provided by ARC to evacuees during the past two months.

Additionally, FEMA extended the deadlines for various Hurricane Katrina applicants to register for assistance based on which disaster they were affected by to the following:

- | | |
|--|------------------|
| • Victims from Florida | October 28, 2005 |
| • Victims from Alabama | October 29, 2005 |
| • Victims from Louisiana and Mississippi | January 11, 2006 |

Week of October 23 – October 29

FEMA established the Chenault Airfield as an MH/TT staging area for the Lake Charles Area Field Office (AFO) in Southwest Louisiana, allowing MH/TT needs to be met in a much shorter time in that area.

FEMA became the primary agency for administration of the Short-Term Lodging Program, which allowed evacuees to stay in hotels and motels at FEMA's expense. Ownership of this program, and the contract with lodging contractor Corporate Lodging Consultants (CLC) transferred from ARC to FEMA.¹⁶

Federal Disaster Unemployment Assistance (DUA) became available to unemployed U.S. nationals or qualified aliens who lost work as a result of the disasters.

Week of October 30 – November 5

The PA deadline was extended to November 30, 2005¹⁷ and FEMA approved the first of many community disaster loans, including \$120 million for the City of New Orleans. Federal officials also began call outs to hurricane-ravaged areas to notify local officials of reimbursements to date.

Week of November 6 – November 12

Harris County, Texas, received a \$1.2 million grant from FEMA to reimburse faith-based shelter operations.¹⁸ Additionally, FEMA IA extended the eligible purchase period for generators in areas of Louisiana from September 25 to November 30 due to the lack of power in the area and the requirement for power in mobile homes, travel trailers, and private residences.

Week of November 13 – November 19

The Transitional Housing Assistance Program (THAP), also known as the hotel program, began its second phase, called the Hotel Population Outreach Program (HPOP), in a continuing effort to relocate evacuees from hotels and motels to longer-term housing options. The outreach had three purposes:

¹⁶ <http://www.fema.gov/news/newsrelease.fema?id=20018>

¹⁷ <http://www.fema.gov/news/newsrelease.fema?id=20346>

¹⁸ <http://www.fema.gov/news/newsrelease.fema?id=20362>

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- To ensure that all evacuees were registered and their eligibility was determined, as well as to give them relevant referrals;
- To explain the IHP program and the resulting benefits if eligibility was determined; and
- To inform evacuees of hotel assistance deadlines and to outline other housing options.

The guidance outlining the timeline for the transition from Stafford Act Section 403 to Section 408 funding (indicating the terminus of hotel assistance under the sheltering provision) established that as of December 1, hotel funding paid under the CLC agreement with FEMA would cease, that States would stop allowing new hotel stays, and that States and localities would restrict new or extended 403 Program apartment leases. Additionally, as of March 1, 2006, all 403 to 408 transitions would be complete. These deadlines would later be extended multiple times.

Finally, a fact sheet was also released on November 15 outlining FEMA's progress toward assisting the evacuees.

Week of November 20 – November 26

FEMA developed the Declaration of Funds Use and Continued Need for Housing Declaration form to ensure that applicants were notified of eligibility requirements for recertification. Guidance was issued authorizing applicant receipt of initial rental recertification by submitting the Funds Use Declaration in lieu of providing the standard receipts documenting use of such assistance. This streamlined the recertification process, as there were nearly 40,000 applicants requiring recertification by this time.

FEMA and the Louisiana Office of Homeland Security and Emergency Preparedness announced that all DRCs in the State would be closed on Sunday's beginning on November 26, 2005. An announcement was also made regarding a two-week extension to the hotel program deadlines through December 15, 2005. Additionally, the ten states with the highest evacuee concentrations were given the chance to apply through the Governor for an extension of the program in their State through January 7, 2006.¹⁹

A deadline was also announced for FEMA-funded housing voucher programs. Beginning on December 1, 2005, FEMA would no longer sign apartment leases under Section 403 of the Stafford Act, the emergency sheltering provisions. All current 403 apartment leases would end by March 1, 2006, and after that point, evacuees would be expected to pay for their apartment through the IHP funds they received through the FEMA assistance process, through HUD's KDHAP, or through their own financial means. If evacuees elected not to stay in the apartment through the end of their lease, FEMA also offered to pay the penalties for early lease termination.

¹⁹ <http://www.fema.gov/news/newsrelease.fema?id=20818>

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Week of November 27 – December 3

An additional \$4.2 million in PA funds was approved and disbursed to Alabama, of which more than \$1.4 million went to offset Alabama Department of Conservation and Natural Resources costs to remove debris at Dauphin Island.²⁰ The debris scattered over 6,800 underwater acres created immense navigational hazards and was a threat to public health and safety.

Weeks of December 4 – December 31

FEMA IA authorized FCO's to extend the Other Needs Assistance (ONA) generator purchase eligibility period to additional areas, as power outages required.²¹

The registration period for Louisiana residents was extended from January 11, 2006 to June 1, 2006 as the continuing registration intake flow indicated that many more registrations had yet to be submitted. Additionally, later in the month, registration periods for Alabama, Mississippi, and Texas were extended to March 11, 2006.

Conclusion

The recovery for Hurricane Katrina will continue even long after the 2005 Hurricane Season has drawn to a close. Its profound effects on over a million families will require support and services through IA, PA, Long Term Community Recovery and other programs for years to come.

Overall, the 2005 season was marked by two of the costliest disasters in US history. Hurricane Katrina affected an area three times as large as Hurricane Andrew did in 1992, caused more than six times its economic damage and claimed 20 times more lives. The storm's magnitude made it the greatest challenge FEMA has ever faced and stretched its capability and capacity to the limit.

FEMA's Recovery Division faced momentous difficulties in responding to a catastrophic disaster of this scale. The immediate and profound need for surge staff stretched IA, PA and CR to complete everything from damage assessments to inspections, while providing support staff to numerous JFOs and AFOs. Once staff was acquired, training thousands of new employees and contractors posed new challenges. In addition, the volume of registrations and Helpline calls also revealed capacity issues with both online and phone services to assist applicants. Finally, the sheer numbers of evacuees presented serious challenges when it came to sheltering and longer-term housing, as many evacuees could not return to their homes anytime in the foreseeable future.

These trials and others were addressed in innovative ways. This after action report aims to identify these issues and innovations to expand on and change them to ensure even stronger responses in 2006.

²⁰ <http://www.fema.gov/news/newsrelease.fema?id=20919>

²¹ <http://www.fema.gov/news/newsrelease.fema?id=21598>

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3. OVERARCHING ISSUES

The issues in this section are those common to all or most programs that require both program-specific solutions and Division-level coordination and management to ensure consistency and efficiency across the agency. There are also some issues that are not specific to any one program but that require Division-level policy decisions and management. At the same time, by their very nature, each issue presented in this section is also congruent with agency-wide or department-wide problems; therefore, any Division solution must be in accordance with the existing or revised agency or department directives.

3.1. STAFFING/ORGANIZATION ISSUES

3.1.1. *Staffing Levels*

Issue: There is a chronic shortage of qualified staff throughout the Recovery Division, due to inadequate authorized staffing levels, diversion of authorized positions to other organizations, and inability to fill authorized vacancies.

The Division (and FEMA as a whole) went into the 2005 hurricane season with chronic staffing shortages. Some authorized positions had been diverted to other needs within the DHS and key HQ and Regional vacancies remained unfilled. After Katrina's landfall, this created a domino effect, as permanent on-board personnel were constantly moved into incident-driven priority positions, leaving behind temporary vacancies to be filled on an ad-hoc basis. Inevitably, this led to poor matches of individuals to positions and lack of staff continuity, all while forcing individuals to manage multiple assignments. A variety of staffing surge mechanisms were employed, including the utilization of temporary hires, DAEs, those on detail from OFAs, and support contractors, but none of these surge staff were integrated into a coherent Division-wide plan. This resulted in intermittent staff surpluses for some programs while others continued to suffer from shortfalls. Additionally, positions were filled by individuals who lacked the experience and/or training to execute the mission. Overall, the staffing problem can be divided into two distinct issues: managing permanent staff and improving surge staff capability.

Recommendations:

- Develop a Division-level strategy for ensuring adequate permanent staffing levels to address the chronic permanent staff shortages. This strategy should include the following:
 - Identify and fill the highest priority positions in each program that will be covered by the current agency hiring initiative.
 - Identify any key positions that may remain unfilled, and develop a backup plan for pre-arranged interim backfills.

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- Conduct a Division-wide analysis to determine optimum staffing levels for each program (within any revision to the Division organizational structure), and develop a follow-on plan for staffing up to these levels.
- Maintain and optimize those surge staff who effectively met the requirements during the 2004 and 2005 seasons and create a consistent, phased resource-deployment approach to address surge-staffing needs by conducting the following activities:
 - Improve the tracking of personnel throughout the deployment process.
 - Employ phased-deployment practices.
 - Provide resource-coordination training for those FEMA personnel and TAC liaisons involved in surge staffing.
 - Develop program-specific, centralized teams that adjudicate conflicting demands for resources (FEMA and TACs) on a national basis and provide clear communications with field elements regarding staffing resources status.
 - Create a staffing resources database to document experience, skills, and training for resource-allocation purposes.
 - Develop a consistently applied policy for limiting and managing FEMA staff deployments (e.g., 60 to 90 days for catastrophic incidents).

3.1.2. *Emergency Management Experience*

Issue: Recovery Division programs have experienced a significant loss of the programmatic experience and knowledge base over the past several years. This void impacts personnel across the board, requiring new staff to learn their jobs with inadequate guidance and creating excessive demands on the remaining experienced staff.

Recommendation:

- Identify and interview individuals who may be considering leaving the Division as a first step in developing an incentive program to improve retention rates.
- Identify outside sources of individuals with appropriate levels of disaster management experience for targeted recruitment, both for permanent positions and for extended temporary assignments, such as interagency details and Intergovernmental Personnel Act (IPA) assignments. Potential sources include local and State governments, as well as OFAs and NGOs.
- Identify and implement alternative mechanisms for re-acquiring access to experienced former agency personnel on a temporary basis.

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- Identify former personnel who can serve as part of a training cadre for the transfer of experiential knowledge to current staff; acquire and integrate this cadre into existing training programs.

3.1.3. *Division Organization for Natural Disaster Response and Recovery*

Issue: The current Recovery Division organization is not optimal for major natural disaster response and recovery. The Division contains a patchwork of organic programs, support functions, and management and coordination entities. Inter-program and inter-divisional relationships lack clarity, leading to informal, improvised, and personality-based solutions. While this might work on a day-to-day basis, these ad-hoc arrangements fall apart when there are numerous short-notice redeployments demanded by a catastrophic incident.

Recommendation:

- Improve the Division's organizational structure for managing catastrophic events by conducting a short-term assessment of the internal Division organization and transition for such events, with particular attention to the clarification of inter-program relationships and responsibilities. This assessment should take into account any externally mandated reorganization that may occur in the immediate future.
- Pre-plan potential deployments for catastrophic disasters to allow for transitional overlap and to mitigate organizational gaps.

3.2. TRAINING ISSUES

3.2.1. *Training for Program-Specific Responsibilities*

Issue: In general, training for specific positions within each program is inadequate and inconsistent. While appropriate training courses exist, they are not delivered effectively or in a timely manner to the appropriate people. Cross-program training is also not well coordinated.

Recommendation:

- Improve the effectiveness and consistency of current training programs by designating a Division Training Coordinator and key training points of contact for each program, with the objective of ensuring that training is appropriately targeted to the right personnel and that defined inter-program roles and responsibilities are consistently reinforced.

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3.2.2. NIMS/ICS Training and Implementation

Issue: The Recovery Division (and FEMA as a whole) suffers from an inconsistent and incomplete integration of NIMS into program operations. While this is partly due to lack of training and experience, there are also substantial issues regarding how program operations in HQ interface with NIMS-based tactical field organizations. This situation is complicated by the perception of a substantial number of personnel that NIMS organizational models are not appropriate for programmatic operations. Field organizations show considerable variability in the effectiveness of NIMS implementation. This is partly due to a lack of higher-level position-specific NIMS training. Key issues seem to be the geographical versus functional branch orientation and the chain command under the FCO versus the technical supervision of HQ program leads. Resolution of these issues can only occur when all personnel are at least operating from a consistent understanding of basic NIMS principles and concepts and FEMA-specific applications are determined.

Recommendations:

- To address the immediate shortfall in basic NIMS/Incident Command System (ICS) knowledge:
 - Require IS-100/200 online courses to be completed by all Division personnel.
 - Require position-specific training for critical field-deployed staff positions (e.g., planning section chiefs).
 - Provide executive-level training for HQ and Regional senior managers.
- To address inconsistent NIMS implementation:
 - Develop NIMS-compliant organizational templates for ERTs and JFOs.
 - Distribute the draft (or final, if available) Incident Management Handbook (IMH) to all staff.
 - Develop process diagrams to define the interface between tactical operations under NIMS and HQ-level programmatic decision- and policy-making.
 - Assign pre-designated FCOs with pre-designated staff personnel that are aligned with ICS staff responsibilities (e.g., Ops, Planning, Logistics, Finance). These teams should be maintained for deployment during the 2006 Hurricane Season.
 - Designate a senior staff member as the Division NIMS advocate and trouble-shooter, with particular emphasis on improving the interface between HQ program offices and NIMS-based field organizations. This position should also

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serve as the Division coordinator for implementing the anticipated NIMS-related National Response Plan (NRP) amendments.

- In the longer term, integrate NIMS training and performance criteria into the Division's overall personnel management requirements.

3.3. MANAGEMENT PROTOCOL FOR THE GOVERNOR-TO-GOVERNOR INITIATIVE

Issue: There is no established process for communication and coordination among all State, Federal, and NGO partners when a catastrophic disaster necessitates mass interstate relocations. In September 2005, the Governor-to-Governor relocation initiative was characterized by extensive communication and decision-making outside of normal disaster-management channels, complicating the parallel Recovery Division efforts to develop and implement supporting policies.

Recommendations:

- Designate a senior Division manager to work with the National Governors Association (NGA) and the National Emergency Management Association (NEMA) to develop processes for communication and collaboration between FEMA and the States. As part of this effort, prepare guidance on the communication process (for post-emergency declaration), including timelines for notice and coordination of stand-up and stand-down.
- Establish Memoranda of Understanding/Memoranda of Agreement (MOUs/MOAs) between FEMA and all partners to establish processes for transportation, notification, delivery, reception, and tracking, including special populations.
- Develop planning guidance (based on lessons learned from Katrina) for all States to be prepared for either end of the relocation spectrum (i.e., as a State being evacuated and as a receiving State for relocation).
- Request that law enforcement agencies (State and Federal) collaborate to develop a tracking process to prevent losing track of lost/missing children, illegal immigrants, prisoners, registered sexual predators, and others during a mass evacuation.

3.4. POLICY IMPLEMENTATION PROCESSES

Issue: Within the Division, there is a lack of clarity regarding the process to develop, coordinate, disseminate, and implement policies before and during disasters. There is a perceived mismatch between the ways the IA and PA programs develop and disseminate policy. In particular, the process for DSGs should be articulated more clearly, particularly to define the threshold where a field-level issue requires HQ decision-making.

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Recommendations:

- Streamline and clarify the policy-making processes within the Division by ensuring that all key policy makers have timely input and that all new policies are disseminated in a timely and comprehensive manner to all concerned individuals and agencies. To the extent possible, pre-brief State and local partners on proposed policy changes, and ensure that they have access to pre-designated points of contact to obtain answers to their questions and provide feedback.
- For each program, develop clear and concise flow charts for both normal policy development and for the expedited DSG process, indicating review/concurrence checkpoints, time frames, and issue-resolution points. To the extent possible, make these consistent throughout the Division; where inter-program coordination is required, ensure there is a Division-wide default process.
- To address the specific issue of the 403/408 transition:
 - Have IA and PA review the process outlined in the transition section of both programs' current policies to ensure consistency and inter-program alignment.
 - Assign a PA number (9500 series) and an IA number to each policy.
 - Have Division Director sign both policies.
 - Disseminate each program's policy separately.
- To address the specific issue of DSG development:
 - Ensure that the issue is submitted to the JFO Senior Public Assistance Officer (PAO), who will make the decision to elevate it or not and prepare the draft DSG. The affected State PAO should be involved in the discussion.
 - Ensure that the draft DSG may be reviewed by other programs within the JFO prior to sending to HQ.
 - Ensure that the DSG is reviewed and vetted by the Regional Branch Chief, Headquarters, and the JFO chain of command.
 - Have the PAO sign-off on the DSG.
 - Distribute the DSG via hardcopy (memo from PAO), disaster website, and e-mail. Ensure that it is sent to staff and States, and is available to all parties at the JFO.

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3.5. NRP IMPLEMENTATION

Issue: During the Hurricane Katrina response and recovery, there was a lack of clarity regarding the implementation of portions of the NRP that had not been fully implemented in any previous natural disaster, such as the designation and subsequent operations of the PFO and the roles, relationships, and interactions of the Homeland Security Operations Center (HSOC), Interagency Incident Management Group (IIMG), and NRCC. Confusion regarding the chains of command, duplicative and out-of-sync reporting cycles, and conflicting priorities all adversely affected Division operations. This issue has been recognized in almost every After-Action report to date and has already led to proposed changes in the NRP and its organizational artifacts. These will have a potentially significant impact on operations during the immediate upcoming hurricane season.

Recommendation:

- Require completion of the IS-800 online course regarding the NRP by all Division personnel.
- Designate a senior Division staff member to serve as the NRP action officer to monitor the progress and status of NRP changes and to evaluate their significance as relates to Division programs. Particular attention should be paid to potential staffing demands.
- Ensure that all Division staff members are informed in a timely manner regarding proposed and final NRP changes and consequent changes in Division policies and procedures.
- Designate a lead staff member or manager from each program for outreach to NRP entities who need to be informed about Division program operations; at a minimum, these should include pre-designated PFOs and staff and managers at the proposed National Operations Center (NOC).

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4. ISSUES BY PROGRAM

The issues in this section are divided into Recovery Division Program Areas (e.g., Community Relations, Individual Assistance, and Public Assistance) because the issues and recommendations discussed are program specific.

4.1. FEDERAL COORDINATING OFFICER (FCO)

Although FCO Operations was the functional element within FEMA Recovery Division that was the initial focus of this portion of the Recovery Division After-Action Review, it evolved to address issues of overall operations and management with which FCOs are inherently involved relating to Region Response and Recovery Directors and key HQ personnel.

It is important to note that the respondents interviewed and/or completing the questionnaire for this section included not only the FCOs designated for this disaster, but also their counterpart State Coordinating Officers (SCOs)/State Emergency Management Directors, some local Directors, FCO cadre members filling other key positions during this disaster, Regional Response and Recovery Directors, key HQ personnel, and JFO operations personnel. As such, it is an overall perspective of management and operational issues.

The need for a National Housing Policy and more robust communications capability were two issues raised by the FCOs and Regional Response and Recovery Directors, but these issues are being addressed in the IA Housing section of this document and by the Response Division, respectively.

4.1.1. *NIMS Implementation*

Issue: The implementation of NIMS was inconsistent during the 2005 Hurricane Season with various levels of organizations and different agencies not having a common understanding of unified command and other NIMS principles and, therefore, not applying those principles in the same fashion. This resulted in confusion over roles, responsibilities, and lines of authority, which dramatically hindered coordination and cooperation in Response and Recovery efforts. ESFs at the JFOs, in some cases, seemed to be stovepiped to their parent agencies rather than part of the team supporting the JFO/Unified Command. There was also confusion concerning the applicability of ICS and NIMS for the Recovery Division in that Recovery is program-focused as opposed to Response, which is focused on saving lives. Additionally, some program leads seemed to bypass the FCOs and deal almost exclusively with FEMA HQ program leads.

Recommendations:

- Use the doctrine such as the IMH (being developed) to supplement the required NIMS/ICS self-study courses to educate and train FEMA, ESFs, OFAs, and partners at all levels on how to effectively implement NIMS, practice its implementation

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during exercises and incidents, and develop lessons learned and best practices to improve NIMS implementation. Doing this will help to further its institutionalization throughout disaster operations.

- Leadership should continue to champion the NIMS/ICS as the standard system/structure that will be used by the Recovery Division.

4.1.2. *Centralized vs. Decentralized and Geographical vs. Functional Approaches*

Issue: Inherent in the discussion of NIMS implementation for Recovery programs are controversies over the concepts of centralized vs. decentralized program management and functional vs. geographic organization, which resulted in confusion over who should be and was actually in charge. A functional approach describes centralized program management, while a geographic approach aligns more with decentralized program management. FCOs and those in charge of AFOs or geographical branches, by and large, advocated for decentralized program management, while functional program managers desired centralized program management at HQ. Although the NIMS principle of an individual having only one supervisor is understood, the program person on the ground must be accountable to the FCO but not go against program policy. The principle of unified command perhaps has more applicability in terms of supervision as both the FCO and the program manager need to be in the loop on decisions to ensure effective coordination with the SCO and to ensure program consistency for the disaster. The same analogy also applies to a degree to other Federal agency personnel in ESFs in that they are representatives of their agency, but also have a role within the overall Federal team whether at the NRCC or a JFO.

Recommendations:

- Develop procedures that ensure that all those with geographic responsibilities and those with program responsibilities are coordinating their actions for a unified decision and are not being solely State-, program-, or agency-focused (i.e., “stovepiped”).

4.1.3. *NRP-PFO/FCO and Unified Command Principle for ESFs*

Issue: The NRP and the 2005 Hurricane Concept of Operations (ConOps) did not clearly delineate the working relationship between the PFOs and the FCOs, thus causing confusion in Response operations and in the implementation of Recovery programs. The ConOps was not specific enough to be useful in implementing Response and, particularly, Recovery operations, which resulted in reactive planning, slow response, uncoordinated activities, and inconsistency. During Hurricanes Katrina and Rita, the PFO was given operational responsibilities (perhaps because of concern regarding FEMA’s progress and capabilities) but they were not clearly articulated to all concerned, which led to confusion. According to the questionnaire, a large majority (78%) of the supervisors and managers with an opinion indicated that the NRP was “somewhat ineffective” or “ineffective” in the context of the Katrina response.

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In a related issue, there was delay in making timely decisions because of a general lack of authority to make decisions on the ground level. Decisions made at HQ often brought about unanticipated consequences and were sometimes inconsistent because of a lack of HQ situational awareness.

Additionally, the roles of ESFs as teams integrated into the overall Incident Action Planning and alignment of ESFs in NIMS were not universally understood, resulting in uncoordinated actions. This was evident in the NRCC and at JFOs. This confusion and lack of coordination was widespread, as indicated by the questionnaire responses. Almost 71% of managers and supervisors expressing an opinion in the questionnaire indicated that the “coordination between the NRCC ESFs, IA, and PA staff” was “somewhat ineffective” or “ineffective.” More than 60% indicated that the “operational coordination between the NRCC ESFs and the ESFs at the JFOs” was “somewhat ineffective” or “ineffective.” They also indicated that three main factors that hindered the effectiveness of the ESF coordination were procedures (53%), training (57%), and information flow (63%).

Recommendations:

- Communicate the outcomes from the planned PFO/FCO sessions to all personnel so that the refined working relationships of PFOs/FCOs and the ConOps are approved, understood, and exercised (e.g., during the Regional Hurricane Exercises) prior to hurricane season.
- Ensure that all agencies and personnel involved in ESFs or agency Response and Recovery operations at the NRCC, RRCCs, JFOs, and other sub-elements fully understand and practice their NRP roles, the unified command principle, and integrated Incident Action Planning.
- Establish protocols on who at what level makes which decisions to support NIMS principles and have consistent policies.

4.1.4. Prevalence of Response Training

Issue: FEMA personnel who were deployed initially found themselves in the middle of Response operations (e.g., rescue, evacuations, and other life-safety issues) in the disaster area for which most were never trained. The nature of Response operations for a significant incident, such as Katrina, requires a different perspective than normal incidents in terms of training of key personnel and allowing them the authority to make more timely decisions.

Many FCOs and other key personnel have neither the training nor experience in Response. In some instances, timely decisions could not be made during Katrina because FCOs did not have the requisite authority or their decisions were second-guessed by those not understanding the urgency of Response operations, causing delays or failure of needed resources to be delivered. FCOs were not able to obtain the logistical support

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they needed and received inaccurate information about what was to arrive and when. For example, needed base camp facilities were delayed, which in turn delayed service to victims. Decisions were made at HQ by procurement, OGC, and program personnel without coordination with the FCOs. These practices seem to be in conflict with the NIMS principles.

Recommendations:

- Develop response operations training for FCOs and other key personnel (e.g., logistics, procurement, OGC, and program leads) so all understand the demands and time-sensitive nature of Response operations and support FCOs on the ground to get urgent decisions made and implemented.

4.1.5. *Planning Capabilities*

Issue: JFOs are ill equipped to plan for lengthy Response and even longer Recovery without mid- and long-term planning capabilities for significant incidents.²² Without a long-term solution to this critical planning capability, planning will continue to be ad hoc and reactive. As a result, Response and Recovery will be less effective than necessary.

Prior to this event, the JFO's planning function has primarily focused on situation reporting and daily incident action planning. Situation Reports (SITREPs) were a summary of Recovery program assistance rather than the essential information for Situational Awareness to build a Common Operating Picture for catastrophic disasters or incidents. For incidents beyond the normal and those involving rapid Federal response, JFOs need planning for longer time frames (weeks and months) and for functional areas, such as fuel distribution.

This issue was paramount to the FCOs and Regional Response and Recovery Directors as FEMA's traditional planners have not had the planning expertise to meet this need. DOD planners were able to partially fill this need during phases of Katrina, but FEMA does not have such expertise.

Recommendations:

- As the DOD has significant planning capabilities and is being asked to support FEMA HQ with that expertise, DOD could be further tasked with a pre-scripted MAs to support JFOs for the 2006 Hurricane Season. Having designated planners—who can work within a Region, with States, and across the Federal agencies—to plan for various contingencies and necessary protective actions and support actions would promote a more seamless transition when disasters occur. Coupled with common operational picture and tactical planning templates, the planners could greatly enhance the efficiency and effectiveness of Response and Recovery operations.

²² This issue correlates to the need to understand response operations, incident action planning, and the complexity of a catastrophic disaster.

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- In the long term, institutionalize an enhanced JFO planning capability within DHS/FEMA by identifying the critical knowledge, skills, and abilities and building a cadre of these planners preferably internally, or from other parts of DHS (e.g., Coast Guard) or OFAs.

4.1.6. *Availability of Trained and Experienced Staff Agency-Wide*

Issue: There was a lack of experienced staff and trained people to fill positions because of limited pre-disaster hiring compounded by trained staff being diverted to fill positions for which they were not trained. (A related staffing issue: The use of Peace Corps volunteers and firefighters to supplement staffing shortfalls worked well in many locations when expectations were provided up front and accepted, and when they were adequately trained and directed. However, when expectations were not managed up front, the use of firefighters was not as effective.)

Recommendations:

- Develop a briefing (by Human Resources) regarding the various initiatives and their ConOps, to include deployment and staging, and discuss with the FCO cadre and program leads who will utilize them.
- Develop an effective team roster development/management methodology to replace the current ad hoc process, and develop a strategic rotation policy for long-duration JFO operations for catastrophic events.
- Move FCOs out of the Recovery Division as they are also involved in Response operations.

4.1.7. *Consistency of Policy Application*

Issue: Unclear policies that were not uniformly distributed and were subject to differing interpretations resulted in inconsistent application of policies across the Agency.

Recommendations:

- Make a conscientious effort, even if through technical assistance means, to gather pertinent feedback from applicants and provide clear and understandable policy guidance and develop materials to educate the public on what to expect.

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4.2. ESF 14 – LONG-TERM COMMUNITY RECOVERY

Most of the ESF 14 issues have to do with the fact that this ESF is new and untested. As might be expected with any new support function, the key issues pertained to training and staff experience, policies and procedures, planning, leadership, financial support, and the ESFs relationship to established functions and program areas. It also included issues related to NIMS, ICS, and the Stafford Act.

4.2.1. *Availability of Trained and Experienced ESF 14 Staff*

Issue: There was no dedicated cadre of experienced personnel for ESF 14, in part because the ESF is new and untested. There was a general lack of trained, experienced, and qualified personnel to fill positions in the ESF 14 function, partially because the mission, roles, and responsibilities of ESF 14 are ill defined relative to other FEMA programs and it was therefore difficult to determine the right skill sets for the mission. Beyond the issue of numbers and skill-mix, the lack of training and training materials available to the field staff prompted ad hoc training solutions that were inconsistent and resulted in inefficient and ineffective uses of resources and inadequate management of field staff. ESF 14 management also was strongly encouraged to hire local contractors, which delayed further the delivery of support to impacted communities.

Recommendations:

- Develop the job skill requirements for the function based upon the eventual refinement of the ESF 14 mission statement, policies, and procedures.
- Recruit, train, credential, and retain a dedicated cadre of qualified personnel to support ESF 14.
- Develop a staffing strategy that is scalable, gets people into the field at the right time, and provides consistency across impacted areas.
- Develop and deliver ESF 14 training to identified cadre and Federal, State, local government, non-governmental, and other partners and stakeholders. This training should be based upon a needs assessment that flows from the ESF 14 mission analysis now underway.

4.2.2. *Written Policy and Procedural Guidance*

Issue: The ESF 14 mission, roles, and responsibilities remain unclear to the many stakeholders. Although there is an ESF 14 Annex to the NRP, the supporting body of policy, plans, and procedures remains incomplete. Without this body of guidance, the means for execution in the field remains unclear. The main obstacle to implementation of this body of policy and procedures is a lack of understanding of the scope and breadth of the “long-term recovery mission” *vis-à-vis* traditional FEMA Recovery missions and

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in some cases, Response missions. Additionally, there is no clear chain of command either internal or external to the ESF 14 function in the JFO. One FCO remarked that he would dedicate less than two minutes a day to ESF 14 issues because its role was so ill defined. Consequently, there is no corresponding reporting protocol, information flow, SOPs, or associated role for ESF 14 in short- and long-term planning.

The absence of necessary policy and procedural guidance resulted in the questioning of ESF 14 authority, mission, roles, and responsibilities by senior leadership. Some progress has been made in the development of guidance since Katrina that may alleviate some of this ambiguity, but these documents have not yet been vetted among the partner organizations nor have they been made ready for implementation.

Recommendations:

- Establish clear roles and responsibilities for ESF 14; explicitly define expectations of Federal, State, local governmental, and non-governmental partners; explicitly define the mission, process, and products to be delivered through ESF 14, as well as the limitations of ESF 14.
- Develop a definitive ESF 14 organization and publish an organization chart with clear command and staff functions and the relationship of ESF 14 to the JFO organizational structure.
- Engage FEMA and partners in collaboratively rewriting the SOP to accommodate the information needs, vertically and horizontally, of all Federal, State, local, and volunteer partner agencies.
- Engage FEMA and partners in collaboratively rewriting the ConOps. The ConOps should include the piece of work developed by the ESF 14 working group at the After-Action Conference in April that defined and outlined three activities as stated in the NRP: assessment, technical assistance for planning, and implementation support.
- Distribute on a wider basis existing policy and procedural documents to all potential partners and stakeholders to develop a baseline of knowledge and understanding of the ESF 14 function.

4.2.3. Preparedness Planning and Coordination

Issue: FEMA is the lead agency assigned responsibility in the NRP for overall planning and coordination of the function's activities across Federal, State, and volunteer organizations. Inadequate coordination of preparedness activities among the key partner organizations during "peace time" hindered and delayed the delivery of services to impacted local communities. This was evident through incomplete written policy and procedural guidance and a lack of program/contact information provided to the staff in the field. Additionally, there was inadequate pre-incident convening, planning, and

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coordinating with partners to explore and document ways to leverage available resources through Federal assistance. The lack of preparedness caused duplication of effort, overlapping activities, or gaps in assistance relative to ESF 14 and other FEMA organizations and programs as well as other agency authorities.

Recommendations:

- Convene and coordinate with Federal, State, local, and non-governmental partners to do the following:
 - Explicitly define the roles and responsibilities of Federal, State, local, and non-governmental partners;
 - Formalize coordination mechanisms to identify programs and funding streams;
 - Develop an effective and efficient process to provide long-term community recovery assistance to impacted areas;
 - Rewrite the SOP to accommodate information needs vertically and horizontally of all Federal, State, and local partners, including voluntary agencies, business and industry, Congressional Budget Office (CBO), Federal Business Opportunity (FBO), etc.; and
 - Define staffing to function throughout all phases of SOPs, and obtain written commitments to dedicate sufficient staff to the function from the start (i.e., pre-event and assessment) to finish (i.e., implementation).
- Develop and provide clear guidance to State and local governments to explain ESF 14 purposes, authorities, and limitations, including expected levels and types of State involvement.
- Coordinate, vet, and distribute on a wider basis the existing policy and procedural documents to all potential partners and stakeholders to develop a baseline of knowledge and understanding of the function.

4.2.4. ESF 14 Leadership

Issue: The frequent changes in ESF 14 leadership in the field resulted in inconsistent execution of the function. This was evidenced by changing and/or inconsistent direction, lack of specific goals and objectives, frequent delays, failures to honor commitments, and credibility issues. In Louisiana in particular, the frequent changes in ESF 14 leadership greatly impeded the establishment of strong and consistent leadership and programs with the JFO, field staff, State, and local government representatives. The goal-setting and decision-making scheme was changed so frequently that it diminished the stability, credibility, and effectiveness of ESF 14. The frequent changes in leadership also caused

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confusion and burn-out in the field as well as inefficient use of resources. ESF 14 leaders in the field frequently felt that they did not have the support from their counterparts at the national level.

Recommendations:

- Clearly define the roles, responsibilities, and scope of the ESF 14 lead in the field in FEMA doctrine and documents. Ensure that the FCO and other key JFO staff understand the ESF 14 leader's role and authority.
- Provide support from FEMA Headquarters to the ESF 14 leadership in the field. Develop a "leadership policy memo" expressing explicit support for the function to senior leadership within FEMA and other agencies/partner organizations.
- Develop a staffing strategy that provides for continuity and consistency in leadership for the support function.

4.2.5. Financial Support

Issue: The lack of clarity about a clear source of funding for implementation of the ESF 14 projects by FEMA and OFAs significantly diminished its effectiveness. Because the mission lacked clear funding support, it was perceived only as a coordination function, without the ability to execute FEMA or other Federal agency programs in any meaningful way.

Recommendation:

- Develop clear guidance concerning the funding of ESF 14 projects and clarify expectations among the partner agencies regarding financial and institutional support for ESF 14 initiatives.

4.2.6. Authority Under the Stafford Act and NRP

Issue: The authority to execute ESF 14 missions, as outlined in the NRP, under the Stafford Act was challenged by FEMA and other Federal agency decision makers. This resulted in confusion, frustration, and disruptions in service delivery. Some felt that the Stafford Act does not explicitly address long-term community recovery as an eligible cost.

Recommendations:

- Perform a legal review to determine which of the activities that are described for ESF 14 in the NRP are authorized by the Stafford Act. Based on the results of this review, recommend changes to the NRP and/or the Stafford Act to make them consistent with each other.

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- Consider proposing legislative changes to the Stafford Act for activities that are not currently authorized by the Stafford Act but are deemed necessary and desirable for providing Federal long-term community recovery assistance. The following are examples of areas that should be considered for change:
 - Provisions for catastrophic and/or long-term impact incidents;
 - Definition of long-term community recovery and associated activities;
 - Assessment, technical assistance, and long-term community recovery plans;
 - Clear definition of when support starts and when it ends;
 - Identification of limitations and expectations as they relate to State and local support as well as OFAs and non-governmental partners; and
 - Definition of the authority of ESF 14 activities in the NRP, and where Federal, State, and local authority apply.
- Provide training on the Stafford Act to FEMA; FEMA ESF 14; OFAs; State, Tribal, and local governments; and voluntary agency (VOLAG) partners.

4.2.7. *Utilization of NIMS and ICS*

Issue: The utility of NIMS and ICS for implementing LTCR planning was not clear to many, causing ICS structures to be underutilized or ignored. A lack of knowledge and training regarding NIMS and ICS also contributed to the questioning and/or underutilization of NIMS and ICS. NIMS and ICS are considered by many to address short-term incident management as opposed to longer-term Recovery programs; therefore, ICS concepts as they might apply to ESF 14 were generally ignored. This left ESF 14 out of the loop on incident action planning, priority setting, and other key aspects of JFO operations. At least one FCO believed that ESF 14 belonged in the Planning Section rather than in the Operations Section.

Recommendations:

- Assess the appropriate application of ICS and NIMS to long-term recovery activities.
- Define the optimum location for ESF 14 within the JFO under the ICS architecture and including “command and control” field relationships.
- Provide training to ESF 14 staff and Federal, State, local governmental, NGOs, and OFAs regarding NIMS and ICS to ensure that staff understand how to operate under ICS.

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4.2.8. *Clarity of Activities and Relationship to IA, PA, and Mitigation*

Issue: Ambiguity between ESF 14 activities and FEMA Mitigation, IA, and PA Programs required extensive coordination in the field to avoid gaps and duplications in program execution, especially where disaster housing was involved. Under the NRP, ESF 14 includes “Long-term Community Recovery and Mitigation.” Furthermore, the NRP states that “mitigation assessment and program implementation” are designated activities under ESF 14. Although FEMA has chosen to partition Mitigation from Long-term Community Recovery in its organization’s execution of the mission, there is still overlap in the description of the scope of the ESF.

To be able to reach agreement on common initiatives, most meetings coordinated by FEMA ESF 14 required the presence of Mitigation, IA, and PA representatives in addition to ESF 14. This gave the impression that FEMA did not have a unified position within the Agency regarding ESF 14 issues, as they had to be coordinated in open forum with other agencies present. Additionally, FEMA expected other agencies to have a representative present that could make decisions and speak officially for that agency while FEMA could not do the same.

Recommendations:

- Determine FEMA’s roles and responsibilities in ESF 14 through collaboration with the respective FEMA program areas and empower the ESF 14 lead to speak for the total FEMA role in the function.
- Collaborate with the other Federal partners to re-establish how FEMA will execute its role in accordance with other ESF 14 support agencies.
- Develop and deliver training packages to FEMA ESF 14; representatives of FEMA IA, PA, and Mitigation; and other partners and stakeholders on all FEMA programs and functions.

4.2.9. *Long-term Community Assessment Tool*

Issue: The Long-term Community Recovery Assessment Tool was designed to identify post-disaster community impacts, capabilities, and needs, and provide recommendations regarding Federal operational and staffing support to states. The Tool was used with limited success in Mississippi and Louisiana, but because it is designed to function at the local level and for small-scale incidents, the tool was intrinsically inadequate to meet the magnitude and wide-ranging needs for this catastrophic incident. The following are examples of how the Tool could not address the needs of a disaster of this magnitude and why the validity and reliability of the results generated by the assessment tool were called into question:

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- No DOT data was generated, but most of the transportation routes were significantly damaged or completely destroyed;
- There were inordinate spikes in economic impacts (as the tool gave a significant amount of weight to the number of days the businesses were out of commission);
- Lower than actual housing impacts were revealed (in part due to there being no measure for the number of evacuees in a community); and
- Output was limited and too general.

Poor quality and unreliable results were attributable to improper use of the tool due the absence of training, misuse of baseline assessment data, and the use of incomplete or outmoded input data. Additionally, there were no attempts to test the outcomes generated by the tool against “ground truth.” The baseline guidance generated by the Tool was challenged due to external factors. For example, the political environment undermined the validity of the Tool by causing an over-commitment of service delivery (i.e., adding communities to the tool that were not identified by the tool).

Recommendations:

- Fully evaluate the requirement for a Long-term Community Recovery Assessment Tool to determine its value in assessing impacted communities.
- Consider expanding or modifying the capability of the tool to include catastrophic incidents.
- Enhance the validity and the reliability of the tool by improving input data quality used to generate baseline assessments through coordinating with State and local entities to collect, review, and validate data.
- Enhance the capability of the tool to rapidly assess impacts by adding a more in-depth empirical data-assessment component that can rapidly assess impacted communities (e.g., satellite capacity used in conjunction with GIS to determine assessment of needs, housing, and transportation).

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4.3. PUBLIC ASSISTANCE (PA)

For the most part, PA issues pertain to the catastrophic nature of this event (e.g., policies and available staff not scalable to an event this size) and debris. Additional issues are related to training, the Stafford Act, and the \$1 Million queue.

Catastrophic Events

Current PA policies were written for the “average” or “garden-variety” disaster and do not contain contingencies to address catastrophic events of this magnitude. All policies pertaining to debris monitoring and removal, documentation requirements, funding levels, and staffing procedures should be reviewed and modified to ensure that provisions are made for catastrophic events, potentially including legislative modifications to the Stafford Act. The following specific issues arose from the application of current policy to this catastrophic event.

4.3.1. *Current Debris Policies and Implementation Scalability*

Issue: Time was wasted on issues that were insignificant in scale, such as appropriate truck volumes for debris management, to the neglect of issues that were critical in a catastrophic disaster such as Hurricane Katrina. Under the current program, it was perceived that PA possibly paid more in monitoring costs than it saved in missed debris. PA needs to consider provisions to monitor in a more cost-effective way (e.g., by measuring weight instead of cubic yards).

For example, justification was required for the removal of one limb versus another. In a small storm with a limited number of limbs, this level of justification does not cause much of a delay, but in the case of a large-scale event, it is extremely time consuming, unnecessary, and impedes the recovery dramatically. Additionally, a property owner’s signature was required before debris on their property could be removed. With homeowners spread throughout the country, obtaining signatures became a monumental task. Policies should be considered that allow for removal of debris without these signatures, but only in instances of public health and safety hazards.

Recommendations:

- Develop a scalable methodology to monitor debris operations effectively, efficiently, and at a reasonable cost.
- Review debris removal requirements in light of the issues that arose during this catastrophic event, and modify these requirements as necessary to expedite debris removal during events of this magnitude. Ensure that in expediting debris removal, human and environmental health and safety concerns are not ignored. Some of the policies that need to be reviewed and modified for catastrophic events include, but are not limited to, environmental testing, private property and waterway debris removal, disposal, and monitoring.

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- Clarify the guidance regarding debris removal on private property, gated communities, and private roads to overcome confusion and streamline the removal process, including clarification of what constitutes imminent and substantial danger to allow private debris removal.

4.3.2. *Documentation Requirements*

Issue: Local applicants had difficulty providing the required PA documentation because they did not understand the requirements, the requisite documentation no longer existed, or there was no staff available to retrieve the documentation. In some cases, applicants were unaware of assistance programs or unfamiliar with application requirements. In other cases, municipal staff were unavailable, either because they were missing (e.g., relocated outside the area) or simply too busy to complete applications. Other communities lost municipal buildings where records were kept, and thus were unable to furnish the required certifications or documentation (e.g., Mississippi lost roughly 750 government buildings). The result was that the application process was delayed, as communities tried to recover lost or missing documentation.

Recommendations:

- Prior to the Kickoff meeting, coordinate with State and other partners regarding the best way to deal with applicants' inability to provide the necessary information and documentation due to the magnitude of destruction.
- Consider relaxing the documentation requirements for the first 30 days (or more) following a catastrophic disaster. Many local governments will likely not be functional enough to provide the standard required documentation and will likely need the funding immediately to restore basic functions and services.
- Review documentation requirements and ensure their necessity. Consider modifying (i.e., reducing) documentation requirements for catastrophic events.

4.3.3. *Coverage of Expenses During Catastrophic Events*

Issue: Many of the current PA policies do not address the unique costs or impacts associated with catastrophic events. For example, localities that hosted evacuees had increased human-services costs yet were still ineligible for PA funds.

Additionally, PA is authorized to pay only overtime costs for local governments for performing eligible emergency work. Due to the catastrophic nature of this event, communities lacked revenues to cover even the first 40 hours, resulting in a double economic impact to those families. Similarly, communities are not always able to cover the needs for medical personnel and services that are not currently reimbursable by PA.

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Recommendations:

- Review the unique situations that arise during catastrophic disasters and modify PA policies (and work to obtain legislative modifications to the Stafford Act as necessary) to address the costs associated with these unique circumstances, including (but not limited to) payment for base wages for force account staff who perform eligible emergency work, temporary hires for medical personnel (which would aid in recruitment and retention of temporary employees), and provision of medical services.

4.3.4. *Availability of Qualified Personnel*

Issue: With limited experienced staff and multiple simultaneous disasters, it was difficult to deploy experienced staff among multiple disasters in an equitable manner. The DAE Cadre that existed in 2005 was appropriate for small recovery operations but was not sufficient to handle large disasters in multiple states. In some cases, it took months to obtain sufficient field staff to meet operational requirements adequately.

This deficiency is thought to be in part due to the long lag time to fill vacancies and the DAE freeze, leaving the agency with limited experienced, seasoned staff to mentor and lead the work. Further, disparity in pay for TACs and DAEs, failure to have trained personnel ready (see Section 4.3.10 for additional issues and recommendations regarding training), and the fact that Regions have only one PA specialist per State adversely impacted the adequacy of PA staffing. Additionally, the policy of 30-day staff rotations was detrimental to consistency, continuity, and performance improvement.

Recommendations:

- Establish qualifications for different positions based upon training and experience and identify individuals in relevant tiers as a tool to ensure even distribution and deployment. Revise the Automated Deployment Database (ADD) to accommodate this information and promote more efficient assignments in terms of the use of human resources.
- Consider a rotation period longer than 30 days, and develop a standard transition process for re-deployment to a second disaster or back to the Regions, including the overlap of replacement staff to ensure continuity.
- Train and hire local permanent staff to overcome the problems associated with timed rotations.
- Encourage more States to become self-managed to alleviate the Federal workload.

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Debris

In addition to the debris magnitude issue with catastrophic events as discussed above, there are several debris issues that need to be addressed regardless of the magnitude of the event. Many policies were applied in an inconsistent manner, including those pertaining to debris testing, removal, disposal requirements and debris-removal contractor concerns, and a lack State and local of pre-disaster debris-management plans.

4.3.5. *Application of Debris Testing, Removal, and Disposal Requirements*

Issue: Debris management suffered from inconsistencies in communication, coordination, and implementation particularly pertaining to testing, removal, and disposal requirements for hazardous debris. Changes in the way that debris management policy was interpreted resulted in a great deal of confusion regarding debris removal from waterways, as different agencies provided debris-management staff inconsistent direction on debris handling and disposal.

For example, the U.S. Environmental Protection Agency (EPA) required extra inspections and sampling of certain debris to determine whether it contained asbestos, lead (from paint or other sources), or other hazardous materials to determine proper disposal methods. These additional testing requirements were seen by many outside of EPA as unnecessary because either the reason for the testing was not explained or the testing requirements were inconsistently applied.

As another example, in Louisiana, sediment was considered debris and therefore required disposal. Many different agencies and organizations (e.g., EPA, FEMA, USACE, and nonprofits) were conducting tests on the sediment and obtaining varying results on the level of contamination. This resulted in the same types of sediment being disposed of in different ways, and possibly some sediment being disposed of as hazardous waste when it was not, and conversely, contaminated sediment not being disposed of properly.

Additionally, there were inconsistencies in direction and coordination in the way debris removal on private property was addressed. For example, FEMA issued a disaster-specific policy for private-property debris removal that deemed two Alabama counties eligible for private property debris removal, but FEMA field officials seemed to be making their own eligibility judgments about properties in these two counties. A streamlined approach to private-property debris removal is feasible, but there is not a policy directive or a legal basis to help local governments make those decisions.

Because guidance was not developed ahead of time, FEMA HQ was forced to make decisions “on the fly” and, once made, these decisions were not clearly conveyed to the Regions in a timely fashion. Because each Region may not implement the program in exactly the same way, a change in personnel (especially from a different Region) resulted in a different interpretation of policy and guidance. Even at the field level, Project Officers and Public Assistance Coordinators were applying rules differently.

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Recommendations:

- Improve interagency policies to define roles, responsibilities, and expectations more clearly for debris testing, removal, and disposal for all Federal, State, and local governments.
- Confer with field staff and States before issuing disaster-specific guidance from FEMA HQ. This will ensure that the guidance is practical and does not conflict with State policy and procedures.
- Meet with other agencies—e.g., USACE, United States Coast Guard (USCG), EPA, Natural Resources Conservation Service (NRCS), Council on Environmental Quality (CEQ), NOAA, U.S. Fish and Wildlife Service (USFWS), DOT—prior to and during disasters to discuss policy and procedures, including what standards need to apply for environmental testing of debris and disposal, to ensure consistent implementation across programs and agencies, and to establish who is responsible for specific types of debris, testing, etc. Specifically, work in coordination with NRCS to revise, update, and clarify waterway debris-removal guidance, especially what is and is not eligible.
- Complete and distribute upcoming guidance on hand-loaded trucks, stump removal, and contracting (see Section 4.3.6 for additional issues and recommendations regarding contractors).

4.3.6. *Debris-Removal Contractor Selection*

Issue: Differing State and local criteria for “reasonable” costs and selection of who will complete debris removal make it difficult to determine a standard to ensure decisions are consistent and equitable across locales. In some cases, PA staff noted that local governments were awarding contracts to private contractors whose rates were much higher than estimates from USACE, for example. In other cases, communities found the opposite (i.e., USACE’s rates were higher than those of private contractors). Even when using private contractors, a wide range of estimates for similar work was provided, making it extremely difficult to judge whether costs were reasonable. Timeliness of debris removal was another variable to the decision of with whom to contract.

In some cases, counties that were allowed to select their own contractors were able to begin debris removal sooner. When counties were allowed to choose their own contractor, they were allowed to use performance criteria over price, which encouraged favoritism in awarding contracts. As a result, there were varying levels of cleanup in different areas depending on who conducted the debris removal.

Inappropriate contracting requirements, including an insufficient daily performance rate and a 30-day opportunity to resolve poor performance, contributed to problems associated with debris-removal contractors. Additionally, the monitoring process did not

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allow staff to ensure that contractors were removing only eligible debris and were not claiming more debris than they actually removed.

Recommendations:

- Work with FEMA Policy, OGC, and the Office of Management and Budget (OMB) to develop more specific guidance detailing how to deal with variable State and local criteria by developing standard criteria for reasonableness and what to do when estimates are not reasonable.
- Develop a range of costs by Region for various debris activities as a yardstick to ensure that bids are reasonable.
- Promote multiple awardees to encourage competition and, thus, offer incentives to improve performance.

4.3.7. Pre-Disaster Debris-Management Plans

Issue: The lack of pre-disaster debris-management plans resulted in delays and confusion and, in some cases, ineffective use of contractors. A comprehensive debris-management plan is essential for any disaster, but particularly a catastrophic one. Failure to plan where debris would be disposed of prior to the event was a major complication, causing delays in debris disposal. There can be long-term effects if no plan is in place prior to an event. For example, the New Orleans landfill accepted debris exceeding five times its permit limit by accepting 100 tons of debris because there was no other site planned.

A pre-disaster plan would have provided guidance on contamination levels and would have dictated debris segregation and proper disposal, thereby eliminating or reducing the contamination issues that arose due to the lack of pre-planning. The plan also should have included provisions for wetland protection, historic preservation, and termite control to avoid developing guidance and policies for these issues “on the fly.” More effective and efficient solutions that were protective of health and the environment could have been developed in advance.

Recommendations:

- Use the lessons learned from the lack of pre-planning for a catastrophic disaster such as Katrina to motivate communities (i.e., potential PA funding applicants) to develop pre-disaster debris-management plans. Provide technical assistance to these communities in preparing these plans, including potential language and quality-control requirements for communities to use in contracts with local debris-removal specialists to ensure quality contractor performance. Additionally, States and local communities should pre-negotiate debris-removal contracts to improve start up and cost-efficiency.

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- Prepare two FEMA PA teams that are dedicated to debris removal (i.e., similar to the USACE Planning and Response Teams for debris removal). They should conduct advance-preparedness training and assist in debris-management plans with local applicants. The planning team also should prepare advance standby contracts that can be activated immediately once a disaster occurs to expedite debris removal, testing, and disposal.

Additional Issues

In addition to the catastrophic event and debris issues discussed above, several additional issues should be addressed to improve PA performance during all disasters, including delays in review and funding of projects exceeding \$1million, Stafford Act Section 403 and its uses, and lack of sustained training.

4.3.8. Review and Funding of Projects Exceeding \$1 Million

Issue: Law requires DHS to notify Congress three days before projects exceeding \$1 million are obligated. The notification process resulted in inexplicable delays for some projects and grievances by State and local governments whose projects were delayed. The perceived cause of the delays appears to be, at least to some extent, a result of DHS's lack of familiarity with PA eligibility requirements and PA's lack of understanding of DHS's review criteria. OMB notification relates to informing States' Congressional Offices to allow them time to develop and distribute a press release regarding the funding. Reviewers at DHS and OMB are apparently not aware of the financial consequences for the jurisdiction or the political ramifications of delays if made public. Additionally, the threshold amount for this review has not been changed for years.

Recommendations:

- Meet with OMB and DHS reviewers to educate them on PA eligibility requirements and determine the essential information necessary for their review, and then incorporate this necessary information into the review documents to implement a consistent, timely review process.
- Prepare alternatives to streamline the process including generic press releases, an "if no action" default approval (e.g., five business days), a review waiver for catastrophic disasters (as was done for 9/11), and a methodology for prioritizing requests.
- After discussing the magnitude and nature of the problem, seek legislation to raise the review requirement threshold amount to \$5 million.

4.3.9. Stafford Act Section 403 and Its Uses

Issue: Issues arose about Stafford Act Section 403 and its uses. For example, some States were unclear about what kinds of emergency work or overtime costs could be

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funded under Section 403. Furthermore, confusion arose regarding an appropriate method to transition people whose emergency sheltering costs were covered under Section 403 to Section 408-funded housing.

Recommendation:

- This issue is detailed further and recommendations provided in the IA portion of this report.

4.3.10. Sustained and Consistent Training

Issue: The lack of sustained and consistent training resulted in less effective PA staff, inconsistencies on project work, and complaints by applicants. The PA program is sufficiently complex that even project officers who have completed all the available training do not understand all the nuances of the program. As a result, different project officers apply the PA program differently in similar circumstances, leading to inconsistency.

Exacerbating this problem was the presence of inconsistent qualifications and certifications across the FEMA Regions, which created discrepancies in staff competency. Staff originating from different Regions with the same job title did not have the same experience, training, or skills to do the job expected of them. Additionally, the trained TACs and DAEs were immediately deployed, leaving a lack of trained staff for subsequent deployment. As a result many inexperienced or insufficiently trained staff were sent to the field and provided incorrect or incomplete information to applicants.

Recommendations:

- Provide a budget for year-round PA training.
- Pre-qualify individuals to ensure they have adequate professional experience. For those lacking in experience, provide more than the standard two-week PA training.
- Send training teams to the field to make maximum use of staff time while people await assignments or badges and where training can be targeted on the disaster-specific needs.
- Establish a mentoring program for Project Officers by experienced Public Assistance Coordinators which could include “shadowing.”
- Modify performance reviews and job evaluations to include field and classroom performance assessments and more specific evaluation and questioning.

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- Develop a consistent position description for each type of position across the FEMA PA staff, and establish standard training requirements for PA staff with agreed-upon task books.

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4.4. INDIVIDUAL ASSISTANCE (IA)

IA has undergone many changes over the past several years in response to disasters, management, legislation, funding, technology, media, elected officials, and changing public expectations. Perhaps the most apt summary statement of the effect of these changes to emerge from the interviews is that “the IA program has evolved into a patchwork of services.” Much of the time, those services complement each other and serve victims well. Occasionally, however, those services conflict and cause unintended adverse consequences ranging from difficulty delivering services to the public, Federal officials’ confusion in understanding services, problems concerning the role of contractors, duplication of benefits, and inequities in benefits delivered to clients. After-action review participants suggested that FEMA “step back and look at the big picture” as part of its effort to prepare for the 2006 season.

Housing

4.4.1. *Housing Program Philosophy*

Issue: The implementation of a standard housing program philosophy can cause unintended consequences and gaps in catastrophic or multi-state disasters. Personnel react to situations and implement standard procedures that are consistent with program philosophy and procedures, but are not logical in a disaster of that scope. Providing housing to victims in disaster areas where there are no groceries, mail, police, etc. is an example of failure to react to a catastrophic situation. In “garden-variety” disasters, this type of infrastructure is much more likely to be restored earlier and preserved infrastructure is likely to be much closer geographically. In a catastrophic response, staff often does not have time to think through all the implications of actions, or time to confer with each other and their managers on all the issues and questions they face. As one official put it, “We’re doing more ‘doing’ than ‘thinking’” when reacting to situations and patching together solutions.

The Temporary Housing (TH) program received an unfavorable review from questionnaire respondents. Of those respondents expressing an opinion²³, 63% indicated that the “traditional [housing assistance] portion of the IA program” was “ineffective” or “somewhat ineffective,” 82% indicated that the traditional Travel Trailer and Mobile Home (TT/MH) programs were “somewhat ineffective” or “ineffective,” and 75% indicated that “alternative housing” was “somewhat ineffective” or “ineffective.” Restructuring is clearly required to ensure that the provision of the TH program is effective in large-scale disasters.

Recommendations: Review the overall housing strategy to identify why FEMA does what it does, and whether it should do anything differently depending on the scope and type of the disaster. The objective of this review would be to evaluate and reaffirm or

²³ Note that approximately 25% of those responding to the questionnaire answered the questions relevant to housing.

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revise guidance and policy, as appropriate, pertaining to whether and in what ways the traditional housing program serves disaster victims. Also related to this idea is a broader recommendation to review and assess how IA programs, guidance, and policies work together to accomplish the Recovery mission. The following are specific recommendations to achieve more effective TH provisions in different types of disasters:

- Document IA-proposed Stafford Act changes so that ideas are “on the shelf” and ready to go if and when they are needed.
- Consider a streamlined intake application for catastrophic disasters, and assess the intake application form to determine if it requests unnecessary information, thereby causing processing and eligibility delays.
- Conduct a cost analysis of the feasibility of re-establishing a stockpile of travel trailers and mobile homes.
- Establish, through the Steering Committee, policies for mobile home/travel trailer exclusive use, critical industry, and essential workers.
- Consider eliminating current Individuals and Households Program (IHP) assistance categories and providing assistance in the form of lump-sum cash.
- Continue efforts to change the \$26,200 IHP cap; \$5,200 does not do much for minor repair vs. the cost of placing a family in a mobile home.
- Review the State matching requirements for IA programs in catastrophic disasters.
- Consider seeking authority to fund other agencies that have authority but not the funding to provide assistance, such as HUD for repairing public housing units for victims
- Research compliance provision requirements of the Americans with Disabilities Act (ADA), Fair Housing Act, Architectural Barriers Act, and Uniform Federal Accessibility Standards (UFAS). Revise or develop housing policy to do what is required and what is right, while utilizing appropriate flexibility based on accurate knowledge of the law, not myth or misinformation.

4.4.2. *FEMA-State Housing Memoranda of Understanding (MOU)*

Issue: Due to the catastrophic nature of this event, the State’s capacity to implement its own recovery operations was exceeded. These responsibilities were subsequently shifted to FEMA, but there was (and continues to be) no uniform housing guidance or agreement to help FEMA and States manage housing under catastrophic conditions. The lack of guidance or an agreement often meant that extra time and money were spent assessing sites that were later rejected by local officials and site selection and development were

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delayed. Additionally, extra time and effort were spent during the disaster negotiating roles and responsibilities, which if established prior to the disaster, this time could have been better spent (e.g., selecting sites and placing MH/TT). Finally, States often requested FEMA reimbursement for services that were not generally a Federal responsibility, including trash collection and law enforcement at housing sites.

Recommendations: Develop FEMA-State MOUs to ensure the effective delivery of housing services, as well as the appropriate Federal and State management of the housing programs. Boilerplate language could be developed to facilitate the negotiation of agreements between FEMA and the States. Each MOU should reference the broader FEMA-State agreement. The following MOU terms and conditions could also be included in the MOUs:

- Local officials would identify housing sites first, and once site identification was complete, site inspections would be conducted by FEMA.
- Local governments would pay for local services (e.g., trash collection, law enforcement) at sites where local residents are housed, and FEMA would share the costs at sites where evacuees from other areas are sheltered.
- FEMA would construct sites to national standards, not to local codes.

4.4.3. *Housing Area Command (HAC)*

Issue: From its inception the role and authority associated with the HAC were unclear, resulting in confusion. The HAC was a new program component, which resulted in new and different communication and decision-making procedures. It was intended to provide an early assessment of housing resources during the Response phase and begin early communication and coordination to meet those needs. Once JFOs were operating, the HAC was to transfer its coordination function to them and disband. Instead, the HAC stayed open and attempted to expand its communication and coordination role into operations and decision-making. Housing officials were not clear on the HAC's role or how it fit into the ICS and chain of command. The multi-state Recovery effort exacerbated communication and decision-making problems associated with the HAC. The "Area Command" aspect of the HAC did not function properly because States were unwilling to accept either "Area" solutions or the HAC's "Command" designation. As a result, field staff did not have the authority to make necessary decisions. This resulted in service delays and duplication, as well as contradictory communication and instructions.

Recommendation:

- If a HAC is established, stage it outside the impacted area, limit its function to coordination and not operations, and clarify its roles and responsibilities and the communication/decision-making processes associated with it.

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- If a PFO is appointed for a given disaster, a temporary housing expert should be placed on the PFO staff.
- Whether within the HAC or outside of it, establish a joint housing solution team at the JFO composed of FEMA and core housing partners (e.g., HUD, USACE, States, and others) to eliminate stove-piped communication, integrate operations, reconcile priorities, establish one process for haul and install, and implement a consistent approach to site development.

4.4.4. *Income and Insurance Verification*

Issue: Barriers to sharing employment, income, insurance, housing, and other information—particularly for the purpose of income verification—caused delays in the delivery of some benefits.

Recommendations:

- Facilitate applicant-related communication between IA and PA, and between FEMA and States, HUD, and other key housing partners (e.g., IRS), through a database of key applicant data and information. Share information among partners for income verification, State employment, and insurance verification. Work with FEMA counsel to clarify, comply with, and understand legal barriers.
- Review the screening process between the Small Business Administration (SBA) and IA programs to determine if steps can be eliminated for very low-income applicants.

4.4.5. *Eviction*

Issue: Landlord-tenant statutes were applied to 408 sheltering. Each State has its own eviction laws, which are often inconsistent with FEMA program policies. For example, FEMA leases require 15-day notices for evictions, but States frequently have different requirements. In the past two years, it has become difficult, time-consuming, and damaging to FEMA's image to evict people from MH/TT who are not eligible under Section 408.

Recommendation:

- Treat 408 sheltering as a loan or grant of Federal property. The provision of MH/TT should not be legally construed as a landlord/tenant agreement. Current practices should be reviewed with FEMA counsel, and policy or guidance should be revised as needed. Also, consider addressing changes in FEMA-State agreements and in the new FEMA-State IA MOU (see Section 4.4.2).

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4.4.6. *Elected Officials*

Issue: The demand for a visible FEMA presence compounded by misinformation or misunderstandings about the role and function of DRCs and housing programs and strategy, produced pressure from elected officials, resulting in the improper or ineffective use of resources. Often, great amounts of time and effort were spent educating local officials, disaster victims, and the media about Recovery operations, during Recovery. This push for a DRC in “my” area can pull away scarce staff resources—particularly senior staff qualified to handle these issues—from other Recovery responsibilities. Housing issues are not usually the prime focus of DRCs. DRCs normally serve those best who have already registered with FEMA by providing some answers on eligibility, as well as referrals to other State, local, and voluntary agency resources. In a catastrophic disaster, uncertainty about housing may raise the unrealistic expectation that a DRC will solve the problem.

Recommendations:

- Educate Federal, State, and local legislative delegations prior to an incident about FEMA’s and their own housing roles and responsibilities to reduce pressure, which can result in improper or ineffective use of resources, particularly at DRCs. Be more proactive in outreach and communication to the media and victims before and during disasters to manage expectations.
- Ensure that officials understand that the timing of set-up is critical to optimization of a DRC’s effectiveness and that they should not necessarily be set up on demand.
- Establish a catastrophic housing plan and tie housing SOPs pertaining to the criteria for DRCs to the plan, as one way to manage pressure to establish DRCs in numerous locations.

Human Services

4.4.7. *Human Services Branch*

Issue: Formation of the new Human Services Branch and confusion about its organizational structure led to inconsistent implementation of procedures and confusion regarding roles, responsibilities, and the chain of command, both in the field and at FEMA HQ.

Recommendation:

- Clarify the Human Services Branch organizational structure, and revise/realign IA operations, communication, and processes to work effectively within the Branch. Additionally, ensure that all relevant parties understand the structure.

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- Prior to the start of the 2006 hurricane season specify and communicate housing protocols and authorities, outline Branch roles and responsibilities, and clarify roles, responsibilities, and authorities at AFOs.
- Define staffing requirements to ensure levels are operable and hiring is initiated as needed.
- Develop an interagency housing SOP in accordance with the Human Services Branch structure and processes, and offer interagency training for the SOP, including a module for senior Federal officials, possibly using an online course as a delivery mechanism.
- Hold an annual interagency disaster housing conference, which may contain a training component.
- Resume the use of the Applicant Services Representative.
- Add specialties under the Specialist title on the Human Services Branch organizational chart.
- Release task books and reconstitute HS-21 to fit with new job titles (e.g., what does it take to do this job, and what kind of background/experience does one need?).

4.4.8. *Coordination with States and External Agencies*

Issue: Insufficient coordination between FEMA and external agencies led to the duplication of work and gaps in the continuity of operations. For example, there was no single, identifiable party ultimately responsible for ESF 6 coordination prior to landfall. Limitations on information sharing, due to the Privacy Act, also led to duplication of efforts such as wrap-around services between FEMA and the States.

The need for consolidated information about available resources (e.g., buildings, land, mobile homes, HUD houses) and determining who (e.g., FEMA, HUD, OFAs, or States) would provide services at sites exacerbated coordination challenges and led to numerous disconnected multi-agency conversations (e.g., multi-coordination teams, HAC, and the Recovery management cell) that produced different expectations at the field and command levels. When personnel at both HQ and field levels were trying to solve the field-level problems, decisions from HQ were carried out even if information was incomplete or incorrect. In some cases, Federal personnel relocated as evacuees were transported out of areas, leaving States without a Federal POC.

Inconsistencies with regard to staff being able to collect information on unemployment insurance and issuance of food stamps at some sites but not others, and a general lack of certainty about what the policies were regarding these programs.

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Recommendation:

- Define the roles and responsibilities of each field and Headquarters element. Hold regular, year-round calls with States and partners in addition to Regional Interagency Steering Committees (RISC) meetings—regarding IA and PA issues within a Region—including during disasters.
- Inform partners about FEMA's expected organizational structure (for NIMS compliance) for the 2006 season.
- During events, continue ESF 6 coordination meetings, and post information on the Internet about who is providing what essential services to what sites, for how long, and under what overall organizational structure.
- Make informational calls to States informing them of issues that have arisen and decisions and policies that have been made in one state that could affect a neighboring state.
- Communicate early with regard to what the JFO structure will look like and its state designees.
- Communicate early with OFAs to determine their needs in DRCs (e.g., connectivity) for inclusion in minimal requirements of the DRC toolbox.
- Ask human services partners to reside physically at the JFO and DRCs to facilitate information sharing, and obtain agreement from Federal partners that this is a desirable solution.
- To facilitate the electronic flagging and use of release information, (i.e., 9069 Form) obtain legal interpretations on whether the Privacy Act permits FEMA to share information with certain entities based on their alignment with Recovery goals or the management response plan and whether the Act permits states to obtain signatures of victims, on behalf of FEMA, on information release forms prior to an incident. Inform State and voluntary agencies on what information FEMA is allowed to provide.
- Facilitate family reunification and further assistance to victims by easing constraints on information sharing during disasters, for example by generating a list of the types of information that FEMA is asked to release.
- Obtain legal guidance to determine the validity of voice and electronic signatures for releasing information, clarify the prohibition against releasing specific information, and clarify the consequences of using a broader interpretation of the Privacy Act.

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4.4.9. *Legal, Regulatory, and Policy Requirements*

Issue: IA program requirements or constraints as stipulated by law, regulation, or policy, impeded service delivery to victims. For example, the definition of eligibility meant that the 10% of New Orleans residents who lived in multiple household living situations were ineligible for assistance. As another example, rental assistance grants were based on short-term dislocations (i.e., 1 to 3 months), and although everyone knew that Katrina dislocations would be much longer, victims would not make long-term plans because of uncertainty surrounding the period of assistance. Additionally, the States' capacity to process unemployment claims was limited, causing delays for victims.

Recommendation:

- Modify or formulate policies for providing aid to permanently displaced populations, including temporary housing for longer periods of time.
- Work with victims, from the beginning, to help them make long-term plans, and advise them on appropriate uses of incremental financial assistance in the context of their cap and long-term plans.
- Arrange for FEMA to disburse funds to the Department of Labor that can then disburse those funds to States helping impacted States.
- Ensure States understand eligibility definitions.
- Make ineligibles a priority for voluntary agency assistance.

4.4.10. *Expedited Assistance (EA)*

Issue: Although it suffered from difficulties surrounding implementation, EA delivered by checks, direct bank deposits, and debit cards met very critical victim needs including food, clothing, shelter, medical, and transportation needs. These challenges ranged from the huge number of victims requiring assistance to inequities in how services were delivered, duplication of benefits, policy misunderstandings and misinterpretations, and uneven public communication.

EA policy was announced without proper communication to field staff. For instance, field staff were given talking points that did not provide all the necessary information. Delays in establishing policies and procedures meant delayed public communication, which in turn caused difficulty managing expectations. There were general misunderstandings about the purpose of the money among field staff and the public. The way EA was presented left clients with the impression that it was a free entitlement. This problem underscores training as well as communication issues.

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Confusion and hostilities arose in the shelters as Katrina victims received debit cards and, initially, Rita victims did not. Then the program was abruptly discontinued causing further inequities. There were many reports of victims who received EA while their neighbors did not. Of those questionnaire respondents with an opinion, only 38% felt the program was “effective” or “highly effective.” Victims need this assistance immediately, but the lack of consistent policy and implementation resulted in much confusion and ill will.

Recommendations:

- Improve communication from the field for decision-making about when EA should be initiated and discontinued, and more clearly communicate to the field when decisions regarding EA are made.
- Review and revise FEMA policy for triggering EA and its strategy for disbursing funds.
- Review and revise EA eligibility questions and clarify EA eligibility criteria.
- Train personnel at all levels about the EA program, particularly eligibility.
- Improve FEMA communication to the public about the purpose of EA funds.

4.4.11. Special Needs

Issue: Gaps in information and communication about special needs (e.g., special medications or food needs, handicapped, mentally ill, pregnant, elderly, sick) hindered services to some disaster victims. Gaps exist in the current planning for persons with special needs. For example, there is no plan pertaining to how to deal with medical needs such as oxygen tanks, medicines, toilets, showers, and other items.

Transportation was hampered by the lack of accommodations for special-needs populations. Additionally, there was no system in place to notify the receiving agency of special needs in advance of evacuees arriving at their destination. One manager in Texas spoke of a group of mentally-challenged young adults who “just showed up” from Louisiana.

Special needs associated with housing primarily pertained to access because many structures did not meet ADA standards. Again, most victims arrived with no advance information pertaining to their special needs. A data system to track such needs did not exist, and special needs were seldom documented on evacuees’ FEMA paper work. The lack of planning resulted in many unmet special needs. Additionally, major difficulties were encountered in simply getting victims to facilities to receive assistance such as debit cards.

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Recommendations: Traditionally, voluntary agencies take the lead in addressing special-needs populations. Special arrangements should be incorporated into FEMA's agreements with ARC, other voluntary agencies, and State and local governments regarding the need to incorporate these issues into their planning (e.g., authorize local pharmacies to fill one-week prescriptions until other means are found by patients). ESF 6 and ESF 8 should incorporate special needs in their planning and procedures, specifically:

- Review and revise policies regarding special-needs populations to close gaps in service.
- Deliberately plan for special needs pertaining to Mass Care and housing (e.g., MH and TT).
- Incorporate ADA and other requirements into FEMA policies and procedures pertaining to special-needs populations.
- Deliver supplies to shelters for special-needs populations—especially medical supplies.
- Incorporate a method to identify and track the special needs into Agency data and information collection procedures.
- Train Helpline operators to identify special needs and help applicants obtain needed services.
- Assign a special-needs field staff person to ensure that special needs will be addressed in the field.

Mass Care

4.4.12. Meals Ready-to-Eat (MRE) Management

Issue: The distribution of MREs was mismanaged causing long delays in supplies reaching shelters. Causes for the delays included miscommunication between ARC and other voluntary agencies regarding MRE orders, little (if any) tracking to identify where the MREs were stocked and whether and when they were en route to the shelters, no mechanisms in place to receive the food, and once food began arriving, there was no designated place to unload. Other issues included the lack of baby food in most of the shipments. Some States also apparently had stockpiles of food available, but FEMA did not request it. All of this confusion compounded to result in extreme delays in the delivery of MREs, causing much suffering on the part of the victims.

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Recommendations:

- Clarify the roles and responsibilities within ESF 6 regarding feeding and food distribution.
- Complete a thorough analysis of MRE stockpiles, the geographical distribution and delivery procedures, and the procedures for ordering and receiving supplies. Revise as necessary.
- Develop a tracking system of inventories and movement status to allow receiving locations to plan accordingly.

4.4.13. *Security Clearances*

Issue: Requirements for detailed background checks slowed FEMA's ability to obtain qualified personnel from NVOAD, other voluntary organizations, and contractors into FEMA facilities. This exacerbated other staffing problems such as staffing shortages and matching qualifications to staffing needs and rotations.

Recommendation:

- Explore options for conducting security clearances prior to hurricane season. Identify qualified personnel and conduct as many background checks as possible in advance.
- Evaluate the level of background check necessary for different positions, and prioritize who goes through the background check process first.
- Standardize the process for background checks and establish a procedure for interim security clearances.
- Integrate the background check process into FEMA's certification and training programs.
- Provide NGOs with FEMA security requirements prior to hurricane season and secure funding for FEMA-required NGO background checks.
- Identify a list of existing places authorized to conduct background checks, and provide this list to voluntary agencies prior to hurricane season.

4.4.14. *Voluntary Agencies and the role of Voluntary Agency Liaisons (VALs)*

Issue: A lack of understanding, coordination, and communication between DHS/FEMA and voluntary agencies regarding roles, expectations, and capabilities strained working relationships and hindered service delivery to disaster victims. There is a general lack of DHS/FEMA understanding about the voluntary agency roles and capabilities in disaster

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recovery. Additionally, weak State VOAD structures caused delays in communication and service delivery. The inability of existing donations management systems to handle non-affiliated, grass-roots donation efforts caused buildup of goods, underutilization of donated goods, and the need to discourage donations.

Recommendation: Enhance communication and understanding between DHS/FEMA and voluntary agencies to improve service delivery by conducting the following actions:

- Update the IS 288 curriculum and require all DHS/FEMA employees who may deal with voluntary agencies and donations to complete that training, and create a shortcut/link to the IS 288 course on computer desktops in the JFO or other locations where new personnel are stationed.
- Create training modules about the role of voluntary organizations and permissible engagement of faith-based and community organizations in light of legal requirements.
- Enhance the VAL position by providing incentives for states to designate state-level full-time VALs, re-establishing the VAL position at the FEMA training center, requiring inclusion of VALs in senior staff meetings at the JFOs, consistently applying qualification requirements for VALs, and/or creating fact sheets or FAQs regarding the role of VALs.

Cross-Cutting Issues

4.4.15. ESF 6 Standard Operating Procedure (SOP)

Issue: The adoption of the NRP and generation of an entirely new and expanded concept for ESF 6 that was a large change from past practice had wide-ranging adverse impacts at all operational levels. ESF 6 currently includes the traditional Mass Care feeding and sheltering role as it has in the past, as well as Housing and Human Services. This addition significantly enlarged ESF 6's scope and led to new requirements for management, control, and coordination for all three functions. Conflicting scopes and missions also created confusion. The ARC is regarded primarily as a Mass Care agency while FEMA is accountable for tasks pertaining to not only Mass Care, but Housing and Human Services as well.

The ESF 6 SOP is still in draft form and contains known gaps and holes. It is unclear where the roles of primary and coordinating agencies differ in mission execution. Partners failed to agree on whether the ESF 6 coordinator is simply a preparedness role or a position that also maintains operational significance; however, many respondents to the questionnaire felt strongly that FEMA should step up and create a robust role for itself as coordinator – 74% of those with an opinion characterized the effectiveness of “the coordination between FEMA and ARC at all levels” as “ineffective” or “somewhat ineffective.”

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The lack of a firm understanding of the role of the ESF 6 coordinator and confusion regarding the necessity of reporting to the Human Services Branch Chief in the NRCC contributed to the poor performance of ESF 6. Poor communication and coordination resulted in confusion, inefficient resource utilization, unmet expectations, and service delays. Roles were not clear and/or not agreed upon for primary and coordinating agencies. There was a lack of agreement on the organizational structure. Terminology was confusing (e.g., interim sheltering, transitional housing). Confusion over roles often meant that some tasks were done twice and many were not done at all. One respondent pointed out that voluntary agencies were having a difficult time understanding their proper role in the ESF 6 structure.

Recommendation: Evaluate the centralized coordination of all three functions, clarify policies, and agree to roles and responsibilities under ESF 6. The most critical task before the ESF 6 partners is the completion of the SOP to the greatest degree possible before the start of the 2006 Hurricane Season. To accomplish this objective, however, major policy issues must be addressed and final decisions made regarding roles and responsibilities that all partners can accept. Additionally, it is important that any solution must be achieved with the participation of FEMA and the ARC, as well as other partners, including SBA, USPS, and the Salvation Army. Communication during the SOP's development will lead to better relations and accountability during upcoming operations. The following are also recommended to address the above issue:

- Develop and deliver a comprehensive ESF 6 training program for primary and supporting agencies, including an agreed upon division of roles and responsibilities.
- Create and distribute a one-page fact sheet for ESF 6 representatives at the state level to clarify an interim operational SOP.
- The Mass Care working group should revise and update the ESF 6 SOP and obtain agreement from partners.
- Establish daily ESF 6 calls during a disaster.

4.4.16. *IA Technical Assistance Contract (TAC)*

Issue: Insufficient resources devoted to contract management, coupled with a general lack of familiarity and understanding of the IA-TAC, caused role confusion and confusion regarding allowable contract activities that resulted in service delays. To help manage the IA-TAC for FEMA, contract administrators were brought in from other agencies and, thus, lacked knowledge pertaining to how FEMA programs function. Additionally, there are insufficient SOPs for the utilization of IA-TACs and inadequate integration of contractors to support the Recovery mission.

Recommendation: Improve the efficiency of Contracting Officer Technical Representatives (COTRs) through increased knowledge of IA programs, as well as the effectiveness of contracting rules through the following:

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- Increase the communication and information exchange between the Project Officer (PO) and COTR.
- Utilize COTRs who have a working knowledge of FEMA programs and their unique demands, and recruit and add at least thirty new COTRs who are trained and knowledgeable regarding IA programs. The DHS online COTR certification program should be used to complete this training, which should be followed by actual field deployment, supervised by an experienced mentor. This function should be supported by locating Regional IA staff onsite.
- Train and educate senior officials on the purposes and uses of IA-TAC with specific instructions on how work is given to contractors through the proper channels and a working knowledge of what contractors can and cannot do in their support roles.
- Educate IA officials regarding general contract management with emphasis on the procedures as to how assignments are made as well as what can and cannot be done by contractors.
- Provide IA program training to the contractors themselves. Contractors should be informed of general expectations beyond the actual work elements, such when and how they should, if ever, deal with local officials and their interactions with the public, victims and media.
- Augment the resources available to IA by having well trained standby contractors.
- Procure advance standby contractors for Mobile Home operations (including all aspects of spec MHs) which incorporate the applicable ADA specifications, are as specific as possible, and include more provisions to support performance monitoring and accountability.
- Develop a database of housing services, mobile homes, travel trailers and their locations which can track the assignments of where and who is providing the assistance and includes receiving feedback from contractors as to their actual experiences for incorporation into existing systems.
- Further augment resources by giving a mission assignment to the US Army Corps of Engineers (USACE) to conduct quality assurance of site designs and other appropriate activities. Also consider what activities could be given in advance to HUD and other housing organizations through a mission assignment.

4.4.17. NIMS Integration Agency-wide

Issue: NIMS is perceived to be better suited to events (response) than to processes (recovery), and so has not yet been implemented effectively for IA programs. ICS is typically organized geographically and so does not necessarily serve the IA service

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delivery model, particularly in multi-state recovery efforts. As a result of these conditions, inconsistent ICS implementation caused confusion over roles, responsibilities, the chain of command, and basic information dissemination. One participant commented that there was no organized dissemination of information and that there was a great deal of confusion.

Recommendation: Align IA with NIMS in the best way to deliver recovery programs. IA should develop a policy that outlines how ICS can be implemented most effectively by defining requirements and answering the basic ICS questions.

- For each geographical director, co-locate an IA person who reports to the HS branch director, and whose function would be to support, facilitate, and coordinate with the geographical director on IA decisions.
- Policy should stipulate that all elements of Human Services will report to the Human Services Branch Director at the JFO Level.
- If requirements are identified to support field elements, Human Services personnel will act in a liaison capacity to the Human Services Branch Director.

4.4.18. *Public Communication*

Issue: Ineffective communication with the public created unrealistic service expectations, misunderstandings, and dissatisfaction, all of which led to repeated Helpline calls, appeals, and Congressional hearings. The questionnaire revealed that 54% of respondent felt the communications to the public were ineffective and 54% felt that the Community Relations for IA was ineffective. Participants noted that FEMA is not proactive enough in explaining what it does, how, and why. As a consequence, the public gets information from the media, which is not always accurate. It is also often the case that states communicate a different message than FEMA and other federal agencies. For example, states often communicate that they want people to return home quickly, and FEMA sends the message that immediate return is not possible or advisable. Participants also noted that phone representatives might inadvertently communicate incorrect information or raise false hopes.

Recommendation: Prior to and during events, improve communication with the public and media to create realistic service expectations and provide useful applicant information by revamping explanations and doing regular “peace time” outreach (brochures, newspaper inserts, and educational information), pre-season public service announcements (PSAs) explaining what FEMA does, what FEMA does not do, and who FEMA’s partners are in order to better contain expectations. States and OFAs should also be involved to coordinate messages. Materials should be tailored for regions, seasons, and types of events (e.g., hurricane, tornado, fire, snow, and others).

- Communicate via town hall meetings and use the Joint Information Center (JIC).

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- Public Information Officers (PIOs) need to explain IA programs better and should coordinate with IA on effective more messaging proposals for federal disaster assistance.
- Distribute revised material as part of the DRC 'Go Kit'.
- Distribute revised material at DRCs and at food/water/ice stations.
- Hang revised material on doorknobs in impacted areas.
- Provide a MA for the USPS to deliver material with mail.
- Merge *Recovery Times* into local newspaper's regular print page.
- Call local news and partner with them by giving them an informational interview or human interest story – benefits both sides – local news gets good story and FEMA can get the information out.
- Encourage states to establish a 211 telephone system (like those in Texas, LA, AZ) from which victims can get shelter information, where DRCs are, what the hours are, locations, and telephone numbers
- FEMA should be cautious and deliberate about decisions made and communications sent, particularly around service deadlines. Communication loses meaning, and FEMA loses credibility and trust, when information is issued and then retracted or corrected.

4.4.19. Scalability

Issue: IA policies and procedures designed for small-scale disasters are not all scalable to catastrophic events. FEMA does not have a true catastrophic plan with triggers, and the difficulty in scaling recovery activities results in unmet expectations for program performance. Staffing was a difficult area to scale, for example. FEMA could quickly set up DRCs but could not always staff them with trained personnel. Delivering expedited assistance was another example. Because EA is not a regular IA program, ad hoc processes were implemented to deliver assistance, resulting in disparate practices and confusion.

Recommendation: Review policies and procedures for scalability to catastrophic and multi-state disasters, and identify thresholds or triggers for when specified policies, procedures, or both, should be implemented differently due to the magnitude of the disaster.

- For the IA TAC contract, participants also recommended modeling this after the Registration Intake Readiness contract, contracting out for rapid hiring of surge staff

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for field operations and establishing MOUs with OFAs for responses to catastrophic events.

4.4.20. *New Use of 403 Authority*

Issue: The existing program structure, different permissible uses under 403 and 408 authorities, and the need to solve problems “on the fly” led to new uses of 403 authorities in combination with 408 services. Additional complicating factors were that inspections took too long, IA and PA records were kept in different ways, and projections were needed for multiple days and months but the projections often failed to correctly forecast resource needs. Participants identified numerous problems caused by, or exacerbated by, this situation, including confusion about which services were being provided or received, under what authority, for what purpose, as well as confusing over timing and transitioning from one program to another.

Inequity in services delivered also resulted due to inadequate or inconsistent policy and procedures. Some victims spent months in an apartment under 403 and did not have money deducted from their IHP cap, while others found their own place to stay and did have the money deducted from their caps. Also problematic was the inconsistent communication to disaster victims, landlords, state and local officials, particularly about when 403 services ended and 408 began²⁴ and was compounded by confusions over terminology (403 vs. sheltering). Additionally, eligibility determinations took too long. Victims were put in shelters under 403, and then moved to motels/hotels still under 403 because eligibilities had not been determined to move them to 408. Differences in state reimbursement practices and eviction requirements and the lack of definition pertaining to group site construction and occupancy agreements also created difficulties and duplication of efforts and benefits. Finally, the lack of coordination effort between PA and IA, and with voluntary agencies, and CLC was inefficient.

Recommendation: Since 403 and 408 authorities presently provide FEMA with much of the flexibility needed to provide continuity of housing, it is recommended that FEMA clarify those authorities and apply them, as needed, in cooperation with key housing partners. FEMA should seek the following authorities, through legislative change if necessary:

- Authority to use Section 403 for shelter in structures not ordinarily used, such as hotels, motels, and cruise ships.
- Authority to use Section 408 for long-term housing, similar to 403.
- Authority to take rental assistance out of the cap, thereby treating it as direct assistance, to relieve some equity issues.

To address problems stemming from data collection, storage, and retrieval:

²⁴ This was exacerbated by the fact that there is no policy on when an emergency sheltering phase is over.

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- Use a centralized location for taking questions and filling out IR.
- Facilitate communication between IA/PA, and between FEMA and states, HUD, and other key housing partners, through database of key applicant data and information.
- In recovery operations for catastrophic events, when hotels, cruise ships and other nontraditional forms of shelter might be provided, collect a minimum amount of information – e.g., driver's license, social security number – not to determine eligibility, but simply to track basic victim information for a minimal authorization.
- Write down the forms and fields needed for tracking evacuees, and a process for collecting that information.
- Obtain landlord and renter records at the state level, such as who's in the apartments etc.
- In collaboration with government and NGO partners, use data collected to track evacuee whereabouts during massive evacuations.

To address problems stemming from policy, procedure, and the management of programs:

- Form joint IA/PA housing teams at the JFO (to eliminate stovepipes) to ensure implementation of a single haul and install process, a consistent approach to site development, and a comprehensive housing program to manage and reconcile housing priorities.
- Ensure communication between IA and PA on a weekly basis regarding who is eligible this week to be dropped from 403 because they have switched to 408.
- Take current disaster specific guidance (DSG), refine it, and use it as an SOP guideline; look into FMR guidelines; have an SOP that outlines the information that needs to be collected, standard forms.
- Obtain guidance from FEMA on parties to the lease, and reporting, number of apartments, and the fair market rates (FMR).
- Have a trigger point for use of apartments under 403, and keep it on the table, to be used only in extreme events.
- Develop policy on cut-off dates for people in shelters and hotels.
- Require registration and an authorization code before people can go into a hotel or motel.

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- Obtain OGC confirmation that FEMA can send out eligibility info to applicants without violating the Privacy Act.
- Define group site construction and occupancy agreements.

4.4.21. *Staffing*

Issue: Inefficient staffing processes and policies led to overworked staff, the inability to provide quality services in a timely fashion, and underutilization of trained staff. In general, FEMA is experiencing a shortage of skilled staff as a result of slow hiring and cuts in the funding available for training. There is also a tension between the need to train people before going into the field and actually getting people into the field on a timely basis. This has systemically led to the wrong staff being in the wrong place doing the wrong job. There is no CONOPS in place to identify training needs, there are no plans or procedures in place to execute the CONOPS, and there is no way to match training to plans and procedures to staffing needs.

Additionally, the scale of hurricanes in the past two seasons has put FEMA in a position that it has never been in before, needing to make rotations but not having enough staff to rotate. Backup Regions do not have enough qualified staff to provide support as well as staffing their own operations, and knowledgeable and qualified people are overworked in the field as well as in HQ and Regional offices. The overall staffing situation results in burnout and a drain on DAE staff, creating a reliance on contractors to fill available positions.

Recommendations: Senior FEMA and DHS officials should make staffing an urgent priority to quickly address serious issues. In particular, FEMA should conduct a staffing needs analysis and develop a staffing plan for the upcoming hurricane season. Senior leadership should fill vacant positions before the next hurricane season.

- Offer the PFTs a long-term career incentive/option within FEMA.
- Current term appointments are between one and four years; offer a permanent position after four.
- Modify the Stafford Act to allow a higher cap for DAE training. Expand DAE pool of applicants. Use DAEs working on other disasters and redeploy
- Seek employees from agencies who are downsizing and whose employees are close to retiring
- Develop a needs-based CONOPS based on operational requirements to deal with the fundamental staffing issue of being able to match staffing to need. The CONOPS should be based on a needs assessment so that recovery policies and procedures would be based on operational requirements.

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- For large-scale or multiple events, Establish a mechanism or process to assess staffing needs, determine staff locations, and match need with resources. This could take the form of regional management cells that could analyze available staff and prioritize assignments, or cross-regional, pre-designated teams that are assigned to specific states, along with a steering committee that decided where these teams were needed.
- Develop a rotational policy, including prioritization of assignments between deployment and returning to Regions/home offices.
- Deployment of training staff to contract call centers should not be controlled by one NPSC. A better use of training resources should follow the Incident Command Structure. HQ should make the call, not any single NPSC
- Begin succession planning at GS-11/12 level to prepare for turnover across the next 5-10 years. A related recommendation was to build institutional knowledge by developing things such as “playbooks” to capture experience.
- To scale-up staffing quickly: Review functions and skills to see what skills can be hired locally and speed up the process of local hiring, open staffing calls to the NPSCs, use the national guard, work with Boards of Education to activate substitute teacher lists to obtain employees who have already been through background checks, and maintain a database of past volunteers and skills.

4.4.22. *Training*

Issue: Inadequate training led to mistakes, the necessity to rework things that had already been completed, and inferior IA service delivery. One participant observed that “it was like FEMA had never managed a disaster. There was little history known, and often even less of the existing programs and policies; they made them up as they went.” With training funds reduced in recent years, and with the magnitude of hurricanes in the 2004 and 2005 hurricane seasons, many participants identified training as the single biggest problem in Katrina recovery operations. Training was needed due the introduction of new structures and systems (FRP, ICS, HAC, Human Services Branch, and others). The NPSCs had to gear-up so quickly they could not properly train their staff, resulting in the provision of incorrect information to victims. Those who interview victims are the front line of the DRCs, and inadequate training and supervision resulted in incorrect information. Experienced staff was needed to train others and be in the field managing others. Participants observed the need for training all the way up to senior officials who needed to understand more about FEMA programs, implementation, and the agency’s relationship to government and non-governmental partners.

Recommendation: Invest in interagency recovery training for all personnel levels, including senior officials, in order to prevent mistakes, rework, and poor service delivery. Participants made numerous, specific training recommendations:

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ESF 6 SOP

- Develop and deliver a comprehensive ESF 6 training program for primary and supporting agencies, including an agreed upon division of roles and responsibilities.

Contracting

- Look at duties and responsibilities at functional level and utilize training programs/job aides/SME.
- Develop DVD training for contractors so they can use to train their own employees.
- Train senior managers on the IA programs so they can communicate and not over promise.

NIMS

- Develop and deliver NIMS and National Response Plan (NRP) training in the JFO. Knowledgeable HQ personnel can train all field staff on the general flow of things, including how to document, how to coordinate and communicate with other levels of the agency.

General

- Train a cadre of trainers who focus solely on training others.
- Track who was trained, and for what.
- Have a screening process or evaluation for individuals who have gone through training to determine who can excel and who needs to be trained further.
- Enhance and support COTR training and operations (e.g., use DHS online COTR certification, and mentor new COTRs in immediate field deployment). There should be more IA involvement in setting training proficiency
- Establish IA evaluation component for training.
- Use NPSC general training material as basis for training outside the NPSCs and make this material available over the Web.
- Train senior managers on the programs and what the mission is they are trying to lead.

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- Cross-train people in different areas (both PA and IA, for example).
- Create job aides for different roles.
- Raise training caps and train from general funds. FEMA can not wait for disaster-specific funding to train.
- Update HS21 and develop task books.
- Identify training needs to focus training for the cadre of 3,000 generalists.
- Reestablish training budget for DAE cadre to maintain readiness level.
- Utilize the Emergency Management Institute (EMI). Hire a full time-regional cadre/training manager and tie them to national cadre.
- Target training; be specific on the task staff is to be trained for. Scope down training to increase retention.

4.4.23. *Policy Review and Development*

Issue: FEMA's procedures for reviewing and developing policy – prior to and during disasters – exacerbate other problems and challenges delivering services to disaster victims.

Recommendations:

- Streamline and clarify the policy-making processes within the Recovery Division by insuring that all key policy makers have timely input
- Disseminate new and revised policies in a timely and comprehensive manner to all concerned individuals and agencies
- Pre-brief state and local partners on policy changes, and insure that they have access to pre-designated points of contact to answer questions and provide feedback.
- Sunset disaster-specific policies unless they are reviewed and adopted, as policy, by the Steering Committee.
- Establish a definitive, authoritative source (clearinghouse) for information regarding FEMA policies.

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- Review or establish policies for issues encountered in Katrina recovery operations, including pets, transportation of families back to their home areas, the use of generators, permanently displaced populations and the use of cruise ships as shelters.

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4.5. COMMUNITY RELATIONS (CR)

Many of the issues encountered by CR were due to the unique nature of this event. Katrina's magnitude and severity meant that there was a rush to put "boots on the ground." The inadequate training that resulted from this led to difficulties between surge and experience staffs, inappropriate conduct, and the lack of cultural awareness. Additionally, available plans did not address the large-scale deployment or communications and coordination challenges in the case of widespread destruction of infrastructure that occurred during this disaster.

Other CR issues were due to recurring program-implementation issues, not necessarily attributable to the magnitude and scale of Katrina and Rita. These issues included the lack of a designated CR cadre, lack of buy-in from responders, and a lack of coordination and designation of responsibilities between FEMA and External Affairs/PIOs.

4.5.1. *Pressure to put "Boots on the Ground"*

Issue: The push to have an immediate visible presence in the field was counterproductive. FEMA's desire to have as many people on the ground as quickly as possible is understandable given the images that were coming out of the Gulf Coast Region after the hurricane. However, the quick rush to put "boots on the ground" often came at the expense of sufficient training, appropriate tools, equipment and resources, and the relationship between seasoned and surge staff members. Moreover, there was a lack of a coordinated and integrated effort between HQ and the JFOs. This overall impact affected victims as some staff assigned to CR duties did not have answers to the questions being asked. On several occasions, surge staff could do little more than provide the FEMA 1-800 number. Citizens reported being frustrated with the lack of information and in many cases misinformation that surge staff were providing. This rapid deployment of resources contributed to a negative perception of FEMA's response.

Recommendations:

- Ensure that JFO/HQ staff understand the CR disaster-specific mission and activities, and assess and manage the surge deployment process. For example, if external pressure encourages FEMA to push deployment, coordinate with CR leadership.
- Develop a CR strategic plan that is disaster-specific to fulfill the mission. This plan should include the following critical disaster-specific requirements:
 - CR standards based on the size of the event—specifically, design processes and procedures that outline how CR will operate based on the size of the disaster and potential Generalists deployed to support CR (see Section 4.5.2 for an explanation of Generalists);
 - LOG requirements;

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- Human resource procedures and requirements;
 - Security rules and requirements, including the identification and badging processes;
 - Finance procedures and requirements—for example, credit card rules and how to purchase necessary equipment;
 - MA requirements, which should be based on prior MAs;
 - Procedures for sharing plans and activities with other Recovery partners (internal and external) —for example, ensuring Recovery partners understand CR mission-specific activities;
 - A plan for activation of staff to manage surge staffing;
 - Rules and regulations to effectively work with the Generalist pool—for example, outline the appropriate training for Generalists;
 - A process to deploy experienced staff to the field to lay a foundation for the Generalists—ensure experience is considered when deploying and assigning CR staff; and
 - A plan to coordinate staffing needs and skill sets between the field and HQ.
- Provide adequate training for field personnel (see Section 4.5.2 for additional training recommendations); and
 - Stagger the number of DAEs deployed to ensure an adequate number of qualified staff for multiple disasters.

4.5.2. *CR-Specific Training*

Issue: The need for a large number of CR staff in the field within a very short timeframe after Hurricane Katrina greatly taxed FEMA's ability to adequately train surge staff prior to deployment, leading to frustration on the part of surge staff, experienced field officers, and affected residents. As a result, surge staff had inadequate tools and information necessary to help affected residents, experienced CR field officers were obligated to spend their time training inexperienced surge staff rather than working on their primary duties, and affected residents were given incorrect and conflicting information. Many conference participants commented that a smaller group of properly trained staff would have been more effective during Recovery efforts than the large group of untrained personnel that was actually deployed.

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A current plan under consideration involves creating a Generalist pool of surge staff that can be used by any recovery operations, including CR. If a Generalist pool is created, CR should craft and deliver clearly-defined training, prior to and during field activity, to prepare the Generalists to carry out the CR mission successfully.

Recommendations:

- Provide the appropriate Emergency Management Institute (EMI) training materials and subject matter experts (SMEs) to enable all incoming Generalist and surge staff to perform CR outreach activities. The training itself should, at a minimum, define and explain the CR outreach mission and include disaster basics (IS-292) and FEMA 101. Additionally, require all CR Generalist and Regional staff to attend this initial training and follow-up refresher courses, and ensure there is quality control for training (specifically, that the training is appropriate for the assigned work).
- Deploy the Mobile Training Unit (MTU) to help identify and address on-the-ground training gaps. Specifically, assess the skills, information, and guidance CR staff needs.
- Prior to training, conduct a skills assessment of the Generalist pool, develop a skill-assessment feedback form to aid in this assessment, and conduct preliminary screening (i.e., interview people) to identify special skills (e.g., multiple languages, engineering background) and special needs that might preclude people from deployment. A release process would need to be developed to address those who could not deploy. Incorporate this screening and assessment into a system that would help identify Generalists as future CR DAEs, thus ensuring that the qualified personnel are obtained by CR.
- Provide the following learning opportunities in addition to required training courses:
 - Encourage mentoring between experienced CR staff and new CR staff;
 - Develop an independent-study course entitled “Orientation to CR;” and
 - Develop a CR manual targeted for Generalists (i.e., Field Operation Guidance).
- Develop and provide CR-awareness program training to other internal and external partners (see Section 4.5.9 for additional recommendations for increasing partner awareness and understanding).

4.5.3. *Relationships between Surge and Experienced Staff*

Issue: The large influx of CR surge staff during the 2005 Hurricane Season led to coordination and workflow issues. Roles and responsibilities were often poorly defined and new surge staff and seasoned DAEs in the JFO had difficulty effectively working

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together. In several instances, field personnel thought they were getting experienced DAE staff but instead received relatively inexperienced surge staff. Many DAEs complained that they were forced to spend too much time teaching and training surge staff instead of focusing on the core mission. Additionally, in many cases surge staff members were paid a higher salary than seasoned DAEs, which bred resentment.

Recommendations:

- Clearly define roles and responsibilities for JFO members, and ensure that JFO leadership understands all roles and responsibilities. Clearly distinguish surge, Community Emergency Response Team (CERT), DAE, and firefighter personnel to avoid confusion of roles.
- Provide better training to surge staff and management training for managers (see Section 4.5.2 for additional training recommendations).
- Provide surge staff only when and in the numbers requested by the JFO, and have an exit strategy for surge staff once their specific roles are fulfilled.

4.5.4. CR Personnel Conduct

Issue: Because of the decision to quickly place boots on the ground, people were deployed before receiving clear standards of conduct (see Section 4.5.1 for additional issues and recommendations caused by quickly deploying large numbers of surge staff). This resulted in some field workers dressing inappropriately and exhibiting inappropriate behavior and language. FEMA headquarters received numerous complaints from fellow employees and citizens regarding inappropriate language and behavior. Additionally, some residents complained of a general callous attitude on the part of CR staff.

Recommendations:

- Develop standards for dress and behavior and provide these requirements to all FEMA staff. This information should be supplied during the recruitment process, in letters to all deploying staff prior to deployment, during orientation at Mobilization (MOB) centers and JFOs, in the FCO's administrative memo, by cadre managers in the field, on the FCO website, and in any other appropriate and effective manner to reach all field staff.
- Establish a labor-relations presence in the field for employees and establish Equal Employment Opportunity/Human Resources (EEO/HR) field teams.
- Train managers and supervisors to deal with performance and conduct issues (see Section 4.5.2 for additional training recommendations).

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4.5.5. *Cultural Awareness*

Issue: Lack of cultural awareness and understanding among FEMA field staff impeded recovery efforts and led to miscommunication and misunderstanding with local communities. Additionally, language barriers resulted in difficulties and delays in getting printed materials in other languages to affected communities.

Recommendations:

- Evaluate demographics and cultural competencies of the existing workforce (by Region) prior to the disaster and identify cultural competency requirements at the JFO (internal and external). Insufficiencies at the JFO could then more easily be addressed with those competencies previously identified in the Regions.
- Have HQ and Regions work together to identify recruitment sources, develop long-range recruitment plans, and provide recruitment sources for leaders.
- Make cultural competency training mandatory for all employees and develop specific training for leaders to aid them in leading by example.
- Meet with cultural communities during “peace time” to determine potential issues that might arise during a disaster and to aid in developing an area-specific cultural fact sheet that can be distributed to CR staff prior to being deployed during an emergency.
- Address cultural issues in the required State plans (perhaps develop a cultural competency section of the plan).

4.5.6. *Plans for Large-scale Deployments*

Issue: CR deployment plans are not sufficient for large-scale deployments (e.g., Hurricane Katrina), resulting in confusion and ineffective use and deployment of CR staff. Hurricane Katrina was a much larger deployment than anything the CR program has previously experienced. CR placed more than 3,000 people in the field post-disaster. Previous large-scale deployments rarely if ever exceeded 300 personnel. These enormous increases severely taxed the systems designed to call-up, train, and deploy CR staff.

Staff at the Atlanta staging area were given conflicting information about when and where to deploy, and because of a lack of communication and coordination between the Atlanta staging area and the JFOs, Atlanta sent surge staff before being asked to in some cases, which overwhelmed the system(s) on the ground. Of those responding to the relevant question in the questionnaire, 45% indicated that the “timeliness of staffing hindered the effectiveness of the CR program.”

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Additionally, the separate CR center in Atlanta caused some confusion and delays as people were shuttled back and forth between Atlanta and the Florida staging area. Some people were told to report to both centers, which caused further confusion. CR needs to enhance existing plans to integrate issues and assumptions connected with large-scale deployments.

Recommendations:

- Develop a boilerplate CR Plan and communicate the requirements of the plan to CR managers, other disaster-response partners, and the FCO/SCO.
- Establish one central deployment center with a core CR component that centralizes medical support and issuance of materials.
- Create a strike team composed of seasoned CR management deployed ahead of time to staff the JFO, a MTU and to fill such positions as CR trainers, and a PIO and Congressional Affairs liaisons to communicate with local/national media and other interests.
- Ensure ADD is up-to-date to be able to deploy CR specialists to identified disaster site locations. To ensure CR specialists are assigned to the correct position, do not assign management roles/responsibilities until they are deployed to a disaster site.
- During large deployments, identify the total number of needed CR surge staff over a 30-day period. This information should be provided by each FEMA JFO in each State (in a multi-state operation) and then be provided to the management cell in the MOB center. Determine the maximum daily processing rate at the MOB to ensure that there are enough staff being called up to meet the expected demand.
- Deploy surge staff to the field in phases and only send the number of staff requested. Additionally, develop an exit strategy for people in the field (and/or) reassign them when the specific mission is accomplished.

4.5.7. *Availability of Appropriate Tools (e.g., laptops, cell phones)*

Issue: Due to the large-scale destruction of local and regional infrastructure, CR field personnel did not have sufficient tools (e.g., laptops, cell phones, and GIS equipment) or the capability to charge them, and thus could not communicate/coordinate with appropriate offices (e.g., JFO). One of the primary roles of CR field personnel is to act as the eyes and ears of the JFO (i.e., reporting back to the JFO on field conditions). The 2005 Hurricane Season destroyed and/or adversely affected infrastructure in a huge area of the Gulf Coast Region. As a result, FEMA field personnel faced logistical challenges unlike any they encountered in the past. This, coupled with the fact that FEMA had more field personnel on the ground than ever before, led to significant challenges coordinating and communicating field activities.

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Recommendations:

- Provide seasoned DAEs with “Go Kits” that include a cell phone (to be activated at the same time their FEMA credit cards are activated), satellite phone, laptop with wireless card, and GIS equipment. The equipment should be kept with the DAEs and activated when they are called to service
- Encourage better use of and make it easier to use the mobile field offices where field personnel can go to charge equipment and send messages.

4.5.8. *Designated CR Cadre*

Issue: The lack of a designated CR cadre results in a less effective, efficient, and focused CR staff. The CR cadre currently only has one permanent full-time (PFT) employee; therefore, most CR staff have other non-CR duties. This makes it difficult for them to accomplish the CR mission as they juggle their other responsibilities and often must put the CR issues on hold to accomplish their other primary duties. A focused CR cadre with ample support and vision is critical to ensure that the CR mission is carried out successfully.

Recommendations:

- Centralize the CR mission and expand the headquarters’ staff by 5 PFTs. These new positions should be GS 12/13, and they should not impact current positions. Develop policies and procedures that establish and support a national, unified CR cadre. These policies and procedures should include requirements and guidance for training and credentialing CR staff.
- If the CR mission cannot be centralized, hire 10 PFT CR staff, one for each Region, and assist State and local governments to build and strengthen their CR staff capacity.

4.5.9. *Buy-In from Responders*

Issue: Internal partners (FCO, State, Operations, Planning, etc.) do not fully understand the CR mission, resulting in the improper or under-utilization of CR staff. Although these partners recognize CR as an asset, they do not understand the core functions and/or abilities of the CR staff. CR has not kept partners and stakeholders apprised of changes in the CR program, and there is a lack of clarity about the roles and responsibilities of the CR cadre. As a result CR personnel have been asked to perform duties and tasks outside the CR mission and are not fully utilized.

Recommendations:

- Upgrade and update existing CR SOPs, Field Operating Guides (FOGs), and other management and field training materials to explain the current and/or changing CR

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roles and responsibilities. Make this training mandatory by issuing a Regional Director policy requiring this training. This will include in-service training in Regional offices.

- Develop and institute a program that will continuously keep partners and stakeholders informed and up-to-date. This program should include information about the CR Steering Committee, a CR overview to be presented in the field, the CR video currently in production (*Helping Those Who Need it Most*), and additional videos, including the following topics and information:
 - Information about the CR work (i.e., timeline sessions);
 - An explanation of how/when people are deployed to the field (i.e., the Grid system);
 - Outline of how CR manages its resources; and
 - An explanation of the CR conference call and how CR works with field operations.
- Improve overall CR performance during field operations to increase credibility and reliability with other programs. This should include enhancing training, communication, and coordination with Recovery stakeholders, and improving CR cadre processes and procedures.

4.5.10. *Coordination and Designation of Responsibilities Between FEMA and External Affairs/PIO*

Issue: Significant bad publicity during the 2005 Hurricane Season highlighted the need for a coordinated effort and clear roles and responsibilities for communication and outreach efforts at FEMA. External Affairs/PIO and CR staff did not effectively coordinate their efforts during the Katrina disaster. It should not be exceedingly difficult to differentiate roles and responsibilities between the two groups as their primary objectives are quite different.

External affairs/PIO primarily deals with news and print media organizations and is concerned with overall public information and relations. CR's primary objective is to work with an affected community and provide information to that community as well as report back to the JFO on local conditions. It is imperative that local communities view CR as fair and impartial and above "spin." Both roles are critical for FEMA to succeed, and there must be a consistent message from both groups; therefore, communication and coordination between the two groups is essential. Currently, DHS and CR senior staff are meeting to discuss this issue.

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Recommendation:

- Establish clear roles and responsibilities for External Affairs/PIO and CR staff; explicitly define expectations, process, and products to be delivered by each group, as well as the limitations of each.

Appendix A

Acronyms and Abbreviations

ACRONYMS AND ABBREVIATIONS

ADA	Americans with Disabilities Act
ADD	Automated Deployment Database
AFO	Area Field Office
ARC	American Red Cross
ARF	Action Request Form
CBO	Congressional Budget Office
CEQ	Council on Environmental Quality
CERT	Community Emergency Response Team
CLC	Corporate Lodging Consultants
ConOps	Concept of Operations
COTR	Contracting Officer's Technical Representative
CR	Community Relations
DAE	Disaster Assistance Employee
DHOPS	Direct Housing Operations
DHS	Department of Homeland Security
DMAT	Disaster Medical Assistance Team
DMA2K	Disaster Mitigation Act of 2000
DOD	Department of Defense
DOT	Department of Transportation
DRC	Disaster Recovery Center
DSG	Disaster Specific Guidance
DUA	Disaster Unemployment Assistance
EA	Expedited Assistance
EEO/HR	Equal Employment Opportunity/Human Resources
EFT	Electronic Funds Transfer
EMAC	Emergency Management Assistance Compact
EMI	Emergency Management Institute
EOC	Emergency Operations Center
EPA	Environmental Protection Agency
ERT	Emergency Response Team
ERT-A	Emergency Response Team-Advanced
ERT-N	Emergency Response Team-National
ESF	Emergency Support Function
FBO	Federal Business Opportunity
FCO	Federal Coordinating Officer
FMR	Fair Market Rental

FOG	Field Operations Guide
FRP	Facilitated Relocation Program
GIS	Geographic Information System(s)
HAC	Housing Area Command
HPOP	Hotel Population Outreach Program
HQ	Headquarters
HS	Human Services Branch
HSOC	Homeland Security Operations Center
HUD	U.S. Department of Housing and Urban Development
IA	Individual Assistance
IAP	Incident Action Plan
IA-TACs	IA Technical Assistance Contractors
ICS	Incident Command System
IHP	Individuals and Household Program
IIMG	Interagency Incident Management Group
IMH	Incident Management Handbook
IPA	Intergovernmental Personnel Act
IRS	Internal Revenue Service
IST	Incident Support Team
JFO	Joint Field Office
KDHAP	Katrina Disasters Housing Assistance Program
LTCR	Long-term Community Recovery
MH/TT	Mobile Homes and Travel Trailers
MOA	Memoranda of Agreement
MOB center	Mobilization center
MOU	Memoranda of Understanding
MREs	Meals Ready to Eat
MTU	Mobile Training Unit
NDMS	National Disaster Medical System
NEMA	National Emergency Management Association

NEPA	National Environmental Policy Act
NERR	National Emergency Resource Registry
NGA	National Governors Association
NGO	Non-Governmental Organization
NHC	National Hurricane Center
NIMS	National Incident Management System
NOAA	National Oceanic and Atmospheric Administration
NOC	National Operations Center
NPSC	National Processing Service Center
NRCC	National Response Coordination Center
NRCS	Natural Resources Conservation Service
NRP	National Response Plan
NVOAD	National Voluntary Organizations Active in Disaster
NWS	National Weather Service

OFA	Other Federal Agencies
OGC	Office of General Counsel
OMB	Office of Management and Budget
ONA	Other Needs Assistance

PA	Public Assistance
PAO	Public Assistance Officer
PDA	Preliminary Damage Assessment
PFO	Principal Federal Official
PFT	Permanent Full-Time
PIO	Public Information Officer
PO	Project Officer
POC	Point of Contact

RAC	Regional Area Command
RISC	Regional Interagency Steering Committees
RNAT	Rapid Needs Assessment Team
RRCC	Regional Response Coordination Center

SBA	Small Business Administration
SCO	State Coordinating Officer
SFO	State Field Office
SITREP	Situation Report
SME	Subject Matter Experts
SOP	Standard Operating Procedure

TA	Transient Accommodations
TAC	Technical Assistance Contractor
TD	Tropical Depression
TH	Temporary Housing program
THA	Temporary Housing Assistance
THAP	Transitional Housing Assistance Program
TT/MH	Travel Trailer and Mobile Home

UFAS	Uniform Federal Accessibility Standards
USACE	U.S. Army Corps of Engineers
USCG	United States Coast Guard
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USPS	U.S. Postal Service
US&R	Urban Search and Rescue

VAL	Voluntary Agency Liaisons
VMAT	Veterinary Medical Assistance Team
VOAD	Volunteer Organizations Active in Disaster
VOLAG	Voluntary Agency (VOLAG).

ATTACHMENT NINE

165:55-7-2.1. 211 Services

(a) **Scope and purpose.** This Section applies to the assignment, provision, and termination of 211 service. Through this Section, the Commission intends to enhance the ability of the public to access services that provide free information and referral to community resources in situations that are not immediately life-endangering, but still represent a serious but less urgent threat to basic human needs and individual's health or welfare.

(b) **Definitions.** The following words and terms, when used in this Chapter, shall have the following meanings unless the context indicates otherwise:

(1) **"Alliance of Information and Referral Systems (AIRS)"** means a professional organization whose mission is to unite and serve the field and to advance the profession of information and referral as a vital means of bringing people and services together. AIRS has developed national quality standards and methods of evaluating information and referral services.

(2) **"211 Call Center"** means a free 24-hour telephone information and referral service for a specified geographical area or region that connects people in need with health and human service agencies and programs that can provide assistance.

(3) **"Community resource"** means a for-profit or nonprofit resource that provides health or human services in a designated geographic area.

(4) **"Information and referral service"** means a free service whose primary purpose is to maintain information about human service resources in the community and to link people who need assistance with appropriate service providers and/or to supply descriptive information about the agencies or organizations which offer services.

(5) **"211 service"** means a telecommunications service provided by a telecommunications service provider to a 211 Call Center through which the end-user of a public phone system has the ability to access information and referral services.

(c) **Requirements of a 211 Call Center.** An entity desiring to be a 211 Call Center shall meet the following requirements:

(1) Ensure 24-hour, seven day a week operations.

(2) Ascribe to the AIRS standards for information and referral and have a plan in place to become accredited by AIRS.

(3) Serve the area or region designated by the 211 Call Center in consultation with telecommunications service provider.

(4) Agree to provide information and referral service consistent with the national standards set out by the AIRS and this Section.

(5) Agree to use the 211 service exclusively for the distribution of information and referral, and not use the service for commercial advertisements.

(6) Provide information and referral service to a caller without charging a fee on either a per-call or per-use basis.

(d) **Provision of 211 service to a 211 Call Center.** Upon request, a telecommunications service provider shall provide 211 service within a specific geographic area or region to an entity which has self certified that it meets the requirements as set out in subsection (c) above; has been certified by the statewide 211 Advisory Committee as the 211 Call Center for that geographic area or region; and has provided maps or other identifying information to the Commission sufficient to identify the area it will serve. In the event that two or more entities request 211 service as the 211 Call Center for the same geographic area or region, the statewide 211 Advisory Committee shall resolve the dispute.

(e) **Fee.** The telecommunications service provider shall charge the 211 Call Center tariffed rates for tariffed services.

[Source: Added at 20 Ok Reg 2301, eff 7-15-03]

TITLE 165. CORPORATION COMMISSION
CHAPTER 55. TELECOMMUNICATIONS SERVICES
PERMANENT RULES
AMENDED, EFFECTIVE 7-15-2003

NOTE: These rules are provided for the convenience of those who are affected by the jurisdiction of the Oklahoma Corporation Commission. Although the text of these rules is the same as the text on file in the Office of Administrative Rules, they are not the official version of the Oklahoma Administrative Code. Official rules are available from the Office of Administrative Rules of the Oklahoma Secretary of State.

CHAPTER 55. TELECOMMUNICATIONS SERVICES

Subchapter	Section
1. General Provisions.....	165:55-1-1
3. Certificates, Reports, and Records	165:55-3-1
5. Rates and Tariffs.....	165:55-5-1
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21. Pay-Per-Call Services.....	165:55-21-1
22. Resolution Disputes	165:55-22-1

Appendix A. Telecommunications Complaint Report Form

Appendix B. Customer Complaint Codes

[**Authority:** OKLA. CONST. art. IX. §18]; 17 O.S. §§ 131 *et seq.* and 139.101 *et seq.*]

[**Source:** Codified 12/31/91]

SUBCHAPTER 1. GENERAL PROVISIONS

Section	
165:55-1-1.	Purpose; short title
165:55-1-2.	Jurisdiction
165:55-1-3.	Application of rules
165:55-1-4.	Definitions
165:55-1-5.	Interpretation of rules
165:55-1-6.	Relief from rules
165:55-1-7.	Exceptions or variances
165:55-1-8.	Supremacy
165:55-1-9.	Rules conform to law
165:55-1-10.	Controversy over rules
165:55-1-11.	Severability
165:55-1-12.	Conflict with Commission order
165:55-1-13.	Conflict with filed tariffs
165:55-1-14.	Tariff conformance [REVOKED]
165:55-1-15.	Exclusions
165:55-1-16.	Universal service

165:55-7-2.1. 211 Services

(a) **Scope and purpose.** This Section applies to the assignment, provision, and termination of 211 service. Through this Section, the Commission intends to enhance the ability of the public to access services that provide free information and referral to community resources in situations that are not immediately life-endangering, but still represent a serious but less urgent threat to basic human needs and individual's health or welfare.

(b) **Definitions.** The following words and terms, when used in this Chapter, shall have the following meanings unless the context indicates otherwise:

(1) **"Alliance of Information and Referral Systems (AIRS)"** means a professional organization whose mission is to unite and serve the field and to advance the profession of information and referral as a vital means of bringing people and services together. AIRS has developed national quality standards and methods of evaluating information and referral services.

(2) **"211 Call Center"** means a free 24-hour telephone information and referral service for a specified geographical area or region that connects people in need with health and human service agencies and programs that can provide assistance.

(3) **"Community resource"** means a for-profit or nonprofit resource that provides health or human services in a designated geographic area.

(4) **"Information and referral service"** means a free service whose primary purpose is to maintain information about human service resources in the community and to link people who need assistance with appropriate service providers and/or to supply descriptive information about the agencies or organizations which offer services.

(5) **"211 service"** means a telecommunications service provided by a telecommunications service provider to a 211 Call Center through which the end-user of a public phone system has the ability to access information and referral services.

(c) **Requirements of a 211 Call Center.** An entity desiring to be a 211 Call Center shall meet the following requirements:

(1) Ensure 24-hour, seven day a week operations.

(2) Ascribe to the AIRS standards for information and referral and have a plan in place to become accredited by AIRS.

(3) Serve the area or region designated by the 211 Call Center in consultation with telecommunications service provider.

(4) Agree to provide information and referral service consistent with the national standards set out by the AIRS and this Section.

(5) Agree to use the 211 service exclusively for the distribution of information and referral, and not use the service for commercial advertisements.

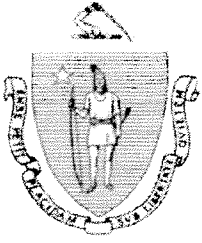
(6) Provide information and referral service to a caller without charging a fee on either a per-call or per-use basis.

(d) **Provision of 211 service to a 211 Call Center.** Upon request, a telecommunications service provider shall provide 211 service within a specific geographic area or region to an entity which has self certified that it meets the

requirements as set out in subsection (c) above; has been certified by the statewide 211 Advisory Committee as the 211 Call Center for that geographic area or region; and has provided maps or other identifying information to the Commission sufficient to identify the area it will serve. In the event that two or more entities request 211 service as the 211 Call Center for the same geographic area or region, the statewide 211 Advisory Committee shall resolve the dispute.

(e) **Fee.** The telecommunications service provider shall charge the 211 Call Center tariffed rates for tariffed services.

[**Source:** Added at 20 Ok Reg 2303, eff 7-15-03]



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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COMMISSIONER

August 25, 2006

Paul L. Mina
Executive Director, Mass211, Inc.
President and CPO, United Way of Tri-County
46 Park Street
Framingham, MA 01702

RE: Petition of Mass 211, Inc. requesting approval by the Department of
Telecommunications and Energy to implement the abbreviated dialing code "211" for
use as a statewide community information and referral service
D.T.E. 06-30

Dear Mr. Mina:

I. BACKGROUND

On May 12, 2000, the Department of Telecommunications and Energy ("Department") approved the assignment of the abbreviated dialing code "211" to Mass211, Inc. ("Mass211") for use as a community information and referral service in the Commonwealth of Massachusetts. See Petition by the Massachusetts Association of Information and Referral Services and the Council of Massachusetts United Ways, acting in partnership as the Mass 211 Task Force, requesting approval by the Department of Telecommunications and Energy for the assignment of the abbreviated dialing code "211" to the Mass 211 Task Force for use as a statewide community referral service, D.T.E. 99-71 (2000) ("211 Assignment Order"). The Department's assignment of the 211 code to Mass211, however, was conditioned upon Mass211 securing firm commitments for sufficient operational funding. 211 Assignment Order at 15. Specifically, the Department stated that prior to implementation, the Department would review the sufficiency and firmness of both short and long term funding for the 211 program. Id.

II. PROCEDURAL HISTORY

On December 13, 2005, Mass211 submitted to the Department for review and approval Mass211's income and expense plan outlining its start-up phase and year one budget ("Mass211 Initial Filing"). Mass211 submitted additional documentation to support its request for Department approval prior to implementation of the 211 community information and referral service on March 28, 2006. This documentation includes: (1) Mass211's Executive Summary; (2) Contact Information for the Mass211 Board of Directors and Executive Director; (3) Funding Commitment Letters and Spreadsheet; (4) Detailed Program Proposal of The Medical Foundation¹; and (5) executed Service/Management Contract with the United Way of TriCounty (collectively, "Mass211 March Documentation").

On April 28, 2006, the Department held a public hearing in this matter. No objections to the Mass211's petition for approval to implement the 211 community information and referral service were received by the Department.

On July 21, 2006, Mass211 submitted the following documentation in support of its request for final approval to implement the 211 dialing code: (1) Revised Executive Summary and Budget, dated July 7, 2006; (2) Service Agreement with Verizon New England, Inc. ("Verizon") for 211 dialing service; (3) Addendum to Mass211's contract with The Medical Foundation; and (4) spreadsheet listing the status of Mass211's discussions with facilities-based telecommunications carriers in the Commonwealth regarding implementation of the 211 dialing code (collectively, "Mass211 July Documentation").² On August 3, 2006, Mass211 submitted additional documentation: (1) funding commitment letters for the 211 program from three additional Massachusetts United Ways; (2) Mass211's invoice to North Shore United Way for the 211 program; (3) North Shore United Way payment check, dated June 16, 2006; (4) e-mail from Breakfast with United Way Online regarding status of The Calling for 2-1-1 Act of 2005, S. 211/H.R. 896, 109th Cong. (2005); and (5) map charting 211 implementation across the United States (collectively, "Mass211 August Documentation").

Lastly, since July 1, 2006, Mass211 has been operating the community information and referral call center using a toll-free number, 877-211-6277 (see Mass211 August

¹ The Medical Foundation is an established call vendor center that was selected by Mass211 through a competitive bidding process to administer the 211 community information and referral service (see Mass211 March Documentation, Executive Summary at 2).

² On July 31, 2006, Mass211 filed copies of the fully executed Verizon Service Agreement and The Medical Foundation contract addendum.

Documentation, Cover Letter at 1). The call center is based upon a single, central call center model which is operated by The Medical Foundation, with whom Mass211 has an executed contract for call vendor services (Mass211 July Documentation, Revised Executive Summary and Budget at 2). Mass211 contracted with the United Way of Tri-County, headquartered in Framingham, to provide daily management, financial oversight, and marketing for the call center (id.).

III. ANALYSIS AND FINDINGS

A. Start Up and Year One Budget

After review and consideration, the Department determines that Mass211 has demonstrated that it has secured sufficient funding to operate and maintain the 211 program. Mass211's documentation indicate that the revenues for the start-up phase and the year one phase meets or exceeds the expenses for that period (Mass211 Initial Filing, Income and Expense Plan; Mass211 July Documentation, Revised Executive Budget and Summary).³ Regarding the three-month start up phase, Mass211 reports \$18,000 in expenses, which would be funded entirely by the United Ways of Massachusetts (Mass211 Initial Filing, Income and Expense Plan).

Regarding Mass211's financial readiness to implement the abbreviated dialing code across the Commonwealth and to maintain the 211 program after the start up phase, Mass211 reports that the expenses for the first year of operation will be \$530,718 (Mass211 July Documentation, Revised Executive Summary and Budget at 3). As to revenues, Mass211 has received funding commitments for the 211 program from 14 Massachusetts United Ways totaling \$489,000 annually for three years (Mass211 March Documentation, Funding Commitment Letters and Spreadsheet; Mass211 August Documentation, Funding Commitment Letters).⁴ In fact, Mass211 has been receiving payments from supporting United Ways for several months (see, e.g., Mass211 August Documentation, North Shore United Way Check). Additionally, Mass211 will receive an additional \$12,000 in the funding from the Counsel of

³ It is noted that Mass211's income and expense plans does not reflect the \$120,000 of in-kind support to Mass211 as a result of Mass211's agreement with the Commonwealth of Massachusetts' Executive Office of Health and Human Services (Mass211 Initial Filing, Summary).

⁴ Additionally, the Hampshire County United Way has committed to an unspecified amount for the 211 program for 2007 and 2008 (Mass211 August Documentation, Funding Commitment Letter from Hampshire County United Way).

Massachusetts United Ways in the fall of 2006 (Mass211 August Documentation, Cover Letter at 1). Mass211 will also seek additional funding through grants from foundations in the amount of at least \$35,000 annually (Mass211 July Documentation, Revised Summary and Budget). Lastly, Mass211 has secured a line of credit from TD Banknorth in the amount of \$125,000 (Mass211 August Documentation, TD Banknorth Letter). In total, Mass211 reports \$536,000 in revenues for year one (Mass211 July Documentation, Revised Executive Summary and Budget at 3). Thus, along with the \$125,000 line of credit, Mass211 has demonstrated that it has secured sufficient operational funding to cover its projected year one expenses of \$530,000.⁵

B. Long Term Funding

The majority of the funding for the 211 program over the first three years of operation is from individual Massachusetts United Ways and the Council of Massachusetts United Ways. Mass211, however, has not provided any documentation of firm funding commitments for the 211 program beyond three years (*i.e.*, long term funding). Given that the Massachusetts United Way system and the United Way of America deems the 211 program one of its “signature projects” (*see* Mass211 August Documentation, Cover Letter at 2), we expect the Massachusetts United Ways would continue their financial support of the 211 program in the long term. In addition, we review alternative funding sources.

Currently, federal legislation is pending which, if approved, would authorize the appropriation of federal funds to implement and sustain 211 programs nationwide. *See The Calling of 2-1-1 Act of 2005*, S. 211/H.R. 896, 109th Cong. (2005).⁶ At the close of the 108th Congress, there were 182 bi-partisan co-sponsors of the Act (*see* www.211.org/legislation.html). If enacted, the Act would enable Mass211 not only to continue the 211 program beyond year three but also to expand the 211 program. State

⁵ Given the three-year financial commitment of Massachusetts United Ways, Mass211 will likely have sufficient funding to operate the 211 program through the second and third years of operation, assuming expenses are consistent with first year projections.

⁶ The Calling of 2-1-1 Act of 2005 (“Act”) authorizes \$150 million annually for the first two years, and \$100 million for the following four years, to assist states with implementing and sustaining statewide 211 programs. The Act would require participating states to provide a 50 percent match to the grant, which could come from current 211 funding in the community, such as United Way funding, funding from other non-profits, state and local government, foundations and businesses. *See The Calling of 2-1-1 Act of 2005*, S. 211/H.R. 896, 109th Cong. (2005)).

legislation is also being explored. Mass211 states that Senator Karen Spilka, along with more than 40 representatives and senators across the Commonwealth, have agreed to sponsor a supplemental budget request in the fall in support of the 211 program (Mass211 August Documentation, Cover Letter at 2; Mass211 July Documentation, Executive Summary at 3). Additionally, Mass211 states that it will be seeking a line item in the budget of the Executive Office of Health and Human Services⁷ for fiscal year 2008 for an undetermined amount (Mass211 August Documentation, Cover Letter at 2). Finally, Mass211 is also exploring funding from corporations and foundations as well as funding options related to terrorism, bio-terrorism, national disaster preparedness and pandemic preparedness (Mass211 July Documentation, Revised Executive Summary and Budget at 4).

Based upon the documentation presented by Mass211, there is some financial uncertainty as to the long term funding of the 211 program. Nevertheless, the Department determines that the benefits to the public of the 211 program outweigh the risks of allowing implementation of the 211 dialing code for use as an information and referral service in the Commonwealth. First, there are currently over 100 comprehensive and specialized information and referral organizations in the Commonwealth, each with their own name and ten-digit phone number (Mass211 July Documentation, Revised Executive Summary and Budget at 1). By providing an easy-to-remember three-digit number to access all health and human service organizations and government agencies throughout the Commonwealth, the 211 program will assist citizens of the Commonwealth in navigating the complex maze of human service agencies and programs (id.).

Second, while the value of a statewide 211 program is difficult to quantify, we note that a national cost benefit analysis conducted by the University of Texas estimates the net value to society of a national 211 system approaching \$130 million in the first year alone and a conservative estimate of nearly \$1.1 billion over 10 years (see The Calling for 2-1-1 Act of 2005, S. 211/H.R. 896, § 2(5), 109th Cong. (2005)).

Third, given the FCC's nationwide assignment of the 2-1-1 dialing code for information and referral services, even if long term funding for the 211 program does not materialize, there are no negative consequences from a numbering standpoint in granting Mass211's petition for

⁷ The Executive Office of Health and Human Services ("EOHHS") is a state agency which has partnered with Mass211 to provide a statewide database, the Resource Locator, that is currently used by six comprehensive information and referral programs (see Mass211 July Documentation, Revised Executive Summary and Budget at 2). Mass211 notes that the financial investment represented by EOHHS's involvement is over \$225,000 for fiscal year 2007 (id.).

final approval to implement the 211 dialing code here in the Commonwealth. From a consumer perspective, some confusion may result from the possible discontinuance of the 211 abbreviated dialing code, but we would expect that Mass211 would revert back to using a toll-free ten-digit number.

Finally, we note that there is broad national support for 211 programs. Three months after the Department issued its 211 Assignment Order assigning the 2-1-1 dialing code to be used as an information and referral service in the Commonwealth, the Federal Communications Commission ("FCC") assigned the 2-1-1 code to be used exclusively for access to community information and referral services on a nationwide basis.⁸ See FCC 211 Assignment Order. Currently, 39 states, including Washington D.C. and Puerto Rico, have implemented 211 programs, with 16 of those states having 100 percent statewide coverage (Mass211 August 2006 Documentation, Nationwide 211 Implementation Map).

Accordingly, based upon the evidence in the record, Mass211 has secured sufficient funding to implement and maintain the 211 program for three years and that, despite concerns regarding the long term funding for the program, the overall benefit to the public of the 211 program outweighs the financial uncertainty. Therefore, the Department grants the petition of Mass211 for final approval to implement the abbreviated dialing code 211 as a community information and referral service in the Commonwealth of Massachusetts.

C. Implementation of the 211 Abbreviated Dialing Code

The Department's approval of Mass211's petition for final approval to implement the 211 dialing code for use as an information and referral service is effective immediately. All telecommunications carriers operating in the Commonwealth must make the necessary modifications to their switching equipment to route 211 calls to Mass211's toll-free number designated for acceptance of 211 calls, 800-231-4377.

We do not anticipate any difficulties for carriers in making the necessary modifications to their equipment. Mass211 has stated that all facilities-based carriers in Massachusetts have agreed to make the necessary modifications to accomplish this (see Mass211 July 2006

⁸ In the Matter of Request by the Alliance of Information and Referral Systems, United Way of America, United Way 211 (Atlanta, Georgia), United Way of Connecticut, Florida Alliance of Information and Referral Services, Inc., and Texas I&R Network for Assignment of 211 Dialing Code, NSD-L-98-80, N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, Third Report and Order and Order on Reconsideration, FCC 00-256 (July 21, 2000) ("FCC 211 Assignment Order").

Documentation, Telecommunications Carriers Spreadsheet). In fact, Mass211 states that all facilities-based telecommunications operating in the Commonwealth have either completed the switch translations for routing 211 calls to the toll-free number, or that they will complete the switch translations by August 25, 2006 (Mass211 August Documentation, Cover Letter at 1; see also Mass211 July Documentation, Telecommunications Carrier Spreadsheet).⁹ According to Mass211, all facilities-based carriers, with the exception of Verizon, have agreed to complete the switch translations to properly route 211 calls at no charge to Mass211. As for Verizon, Mass211 has executed a contract with Verizon to properly route 211 calls (see Mass211 July Documentation). Accordingly, only final Department approval to implement the 211 abbreviated dialing code to replace the toll-free number currently in use is necessary for implementation of the 211 program. We grant that approval here.

⁹ Verizon Wireless has also implemented the 211 dialing code nationwide at no charge despite the exemption granted in the 211 Assignment Order at 19 to wireless carriers (Mass211 July Documentation, Telecommunications Carrier Spreadsheet).

IV. CONCLUSION

The Department grants Mass211's petition for final approval to implement the abbreviated dialing code 2-1-1 for use as a statewide community information and referral services effective immediately. The Department directs all facilities-based telecommunications carriers operating in the Commonwealth to make the necessary modifications to properly route 2-1-1 calls to the toll-free number, 800-231-4377, designated by Mass211 for the 211 program.

By Order of the Department,

/s/
Judith F. Judson, Chairman

/s/
James Connelly, Commissioner

/s/
W. Robert Keating, Commissioner

/s/
Brian Paul Golden, Commissioner

STATE OF MAINE
PUBLIC UTILITIES COMMISSION

Docket No. 2005-281

June 27, 2005

2-1-1 MAINE, INC.,
Request for Designation As 211 Provider
Pursuant to 35-A, Section 7108

ORDER

ADAMS, Chairman; DIAMOND and REISHUS, Commissioners

I. SUMMARY

We designate 2-1-1 Maine, Inc., as the sole entity entitled to use the 211 numbering code for access to information and referral services in Maine.

II. BACKGROUND

The 211 code is known as an N11 code, which allows for abbreviated dialing patterns.¹ On July 21, 2000, in response to two petitions for assignment of N11 codes, the Federal Communications Commission (FCC) issued an order assigning 211 to community information services and 511 for traffic services. On July 31, 2000, the FCC published its decision addressing the use of 211 as an abbreviated dialing code for information and referral in its *Third Report and Order* in CC Docket No. 92-105. That *Third Report and Order* states, in part:

We believe that providing access to community information and referral services using 211 has many benefits. Individuals will now have an easy to remember nationwide number to call when they need non-emergency help.

[W]e believe that access to community information and referral services using 211 will provide a vital adjunct to existing 311 services. We also believe that 211 service for access to community information and referral services will provide a useful adjunct to 911 service by further reducing calls to 911 that do not require immediate dispatch of police, fire, or medical personnel.

We therefore assign 211 to be used to provide access to community information and referral services.

¹ Congress in 1999, directed the FCC to designate 9-1-1 as a national emergency number.

[W]hen a provider of telecommunications services receives a request from an entity (e.g., the United Way) to use 211 for access to community information and referral services, the telecommunications provider must: (1) ensure that any entities that were using 211 at the local level prior to the effective date of this Order relinquish use of the code for non-compliant services, and (2) take any steps necessary (such as programming switch software) to complete 211 calls from its subscribers to the requesting entity in its service area.

We expect community service organizations to work cooperatively to ensure the greatest public use of this scarce resource.

Third Report and Order, CC Docket No. 92-105, ¶¶ 20-21.

The Maine Legislature recently enacted 35-A M.R.S.A. § 7108, which provides:

The commission [Maine Public Utilities Commission] may designate an appropriate entity to be the sole entity entitled to use the 2-1-1 telephone number assigned by the Federal Communications Commission to be used for access to information and referral services. A designation may not extend for more than 3 years but may be renewed by the commission, after review, for successive periods of up to 3 years each. There is no limit on the number of times the commission may renew a designation of the same entity pursuant to this section. Before making a designation or renewing a designation, the commission shall determine that the designation or renewal is in the public interest. The commission may consult with appropriate state and local agencies and other public or private entities before granting a designation or renewing a designation. The commission may suspend, revoke, terminate or modify a designation if the commission determines the public interest is no longer served by the designation or in response to actions by the Federal Communications Commission that affect the availability or assigned use of the 2-1-1 number.

35-A M.R.S.A. § 7108, (effective April 20, 2005).

On May 5, 2005, the Commission received a letter from 2-1-1 Maine, Inc., filed pursuant to 35-A M.R.S.A. § 7108, requesting that we designate the assignment and use of the 211 numbering code in Maine to 2-1-1 Maine, Inc. The lead partners of 2-1-1 Maine, Inc. are United Ways of Maine and Ingraham (a nonprofit, multi-purpose human

service agency in Portland). 2-1-1 Maine, Inc. provided the Commission with background information regarding its operation and had attended a meeting with Commissioners and Staff to discuss its request prior to the new law being passed. The May 5th request describes how 2-1-1 Maine will provide community service referrals for all areas of the State. (A copy of the May 5th request is attached to this Order.) 2-1-1 Maine, Inc. believes that it is qualified to be the 211 service provider, has already developed numerous resources, and has received a number of funding grants.

On May 18, 2005, we issued a request for comments regarding the request by 2-1-1 Maine. Comments were received from Representative John Brautigam, Conversant Communications, 2-1-1 Maine, and Verizon Maine.

III. COMMENTS

Representative John Brautigam filed comments on May 23, 2005, expressing support for 2-1-1 Maine's designation request.

On June 1, 2005, Conversant Communications submitted comments that took no position regarding the request but stated that the costs of developing, implementing, and operating a 211 dialing program should be borne by the information and referral service providers. Conversant also recommends that the Commission open an extensive proceeding, involving telecommunications providers in Maine, before making a designation.

On June 7, 2005, Verizon submitted comments stating that it took no position on 2-1-1 Maine's application. Verizon did oppose Conversant Communications' comments regarding expanding the proceeding to consider such issues as the design, routing, cost, and payment for the statewide 211 dialing service, stating that such inquiries were premature at this time.

2-1-1 Maine submitted further comments on June 3, 2005, regarding its request for designation. 2-1-1 Maine stated that it would develop a single call center that would be most cost effective; that it would use an experienced call center provider to operate the call center; and that there is a substantial financial commitment for the development phase of the project. In an e-mail message from the project manager received June 16, 2005, Robbie Lipsman stated that 2-1-1 Maine would adhere to accreditation standards contained in the "Standards for Professional Information and Referral – Requirements for AIRS Accreditation and Operating 2-1-1 Systems" published by the Alliance for Information and Referral Systems (AIRS Standards).² She also stated that the accreditation would not be something obtained the first year, but that it will serve as a guideline for development and that 2-1-1 Maine planned to eventually have an accredited service.

² The current edition of the AIRS Standards (4th Edition, Revised October 2002) can be found on the MPUC website at <http://www.maine.gov/mpuc/orders/orders.htm> and <http://mpuc.informe.org/easyfile/>. Also, see www.airs.org.

IV. DESIGNATION

We have considered the materials provided by 2-1-1 Maine as well as the comments of all interested parties and find that the public interest will be served by designating 2-1-1 Maine as the single entity to use and administer Maine's 211 code. We first note that no public funds have been appropriated for the operation of 2-1-1 Maine. Instead, 2-1-1 Maine is developing and implementing the 211 information and referral system with privately donated funds and will be responsible for contracting or coordinating with local telecommunications providers for translation and transport services.

With regard to potential telecommunications-related implementation problems, if 2-1-1 Maine has difficulties or service concerns with local telecommunications providers, it can bring those matters to the Commission's attention through the normal complaint procedures under Title 35-A. As for problems with the underlying program itself, we find that 2-1-1 Maine's incorporation of the AIRS Standards in its service contracts will allow us to monitor the program as necessary to ensure that 2-1-1 Maine meets its obligations as the sole 211 designee in Maine. To that end, we will require 2-1-1 Maine to file an annual report detailing its compliance with the AIRS Standards as well as 211 service availability, public education efforts regarding the operation of the 211 service, technical issues with telecommunications providers, and finances.

Accordingly, we

ORDER

That 2-1-1 Maine, Inc., is designated as the sole entity entitled to use the 211 numbering code for access to information and referral services in Maine for a period of three years from the date of this order, subject to the following conditions:

1. 2-1-1 Maine's referral protocols and procedures will be based on the current edition of the *Standards for Professional Information and Referral, Requirements for AIRS Accreditation and Operating 2-1-1 Systems*, published by the Alliance of Information and Referral Systems, which is incorporated here by reference and shall serve as standards for 2-1-1 Maine's performance under this Order.
2. Within ninety days of this Order, 2-1-1 Maine will provide the Commission with an implementation schedule indicating the date each county will have full access to 2-1-1 Maine's referral services.
3. 2-1-1 Maine will file an annual report with the Commission on or before January 1 of each year summarizing its activity for the past year and including a service quality measurement plan based on the *AIRS Standards*. The report should also include information on service

availability, public education, technical issues with telecommunications providers, and finances.

Dated at Augusta, Maine, this 27th day of June, 2005.

BY ORDER OF THE COMMISSION

Nancy Goodwin
Acting Administrative Director

COMMISSIONERS VOTING FOR: Adams
 Diamond
 Reishus

NOTICE OF RIGHTS TO REVIEW OR APPEAL

5 M.R.S.A. § 9061 requires the Public Utilities Commission to give each party to an adjudicatory proceeding written notice of the party's rights to review or appeal of its decision made at the conclusion of the adjudicatory proceeding. The methods of review or appeal of PUC decisions at the conclusion of an adjudicatory proceeding are as follows:

1. Reconsideration of the Commission's Order may be requested under Section 1004 of the Commission's Rules of Practice and Procedure (65-407 C.M.R.110) within 20 days of the date of the Order by filing a petition with the Commission stating the grounds upon which reconsideration is sought.
2. Appeal of a final decision of the Commission may be taken to the Law Court by filing, within **21 days** of the date of the Order, a Notice of Appeal with the Administrative Director of the Commission, pursuant to 35-A M.R.S.A. § 1320(1)-(4) and the Maine Rules of Appellate Procedure.
3. Additional court review of constitutional issues or issues involving the justness or reasonableness of rates may be had by the filing of an appeal with the Law Court, pursuant to 35-A M.R.S.A. § 1320(5).

Note: The attachment of this Notice to a document does not indicate the Commission's view that the particular document may be subject to review or appeal. Similarly, the failure of the Commission to attach a copy of this Notice to a document does not indicate the Commission's view that the document is not subject to review or appeal.

DT 04-027

**NEW HAMPSHIRE COALITION OF COMPREHENSIVE
INFORMATION AND REFERRAL SERVICES**

**Petition of the United Ways of New Hampshire and the
New Hampshire Coalition of Comprehensive Information and Referral Services for
Designation of the Coalition as Lead Implementing Agency for 211 Services**

**Order Nisi Granting Petition and Designating the New Hampshire Coalition of
Comprehensive Information and Referral Services as Lead Agency for 211 Services**

O R D E R N O. 24,363

August 19, 2004

On March 4, 2004, the United Ways of New Hampshire (United Ways) and the New Hampshire Coalition of Comprehensive Information and Referral Services (Coalition) filed with the New Hampshire Public Utilities Commission (Commission) a petition requesting that the Coalition be formally designated as the lead implementing agency for “211” service in New Hampshire.

On July 21, 2000, the Federal Communications Commission (FCC) assigned 211 as a national abbreviated dialing code to be used for access to community information and referral services. *See U.S. Dep’t of Transportation*, 15 FCCR 16,753 (Jul. 21, 2000). The FCC found that “[i]ndividuals facing serious threats to life, health, and mental well being have urgent and critical needs that are not addressed by dialing 911 for emergency assistance or 311 for non-emergency police assistance.” *Id.* at 16,764. In the view of the FCC, a universally and easily recognizable number, such as 211, would make it possible for callers in need to make critical connections with appropriate community-based organizations and government agencies more easily.

The Coalition was established in 2003 and comprises all five of the state’s

comprehensive information and referral (I&R) agencies. Three of these five I&R agencies provide coverage to defined communities or regional areas but without 24 hour-a-day, 7-day-a-week (24/7) coverage. The fourth I&R covers a defined area and provides specialized topical I&R, 24/7 coverage. The fifth I&R covers a defined region and provides 24/7 statewide coverage.

The Coalition states that it has developed an information system it believes will be the most complete, accurate, and inclusive available; that the Coalition has the requisite knowledge, skills, and experience in information management and an understanding of the service delivery system; and that there is an existing trust of those who currently utilize the services the Coalition offers. The Coalition proposes a 211 system that would have the ability: (1) to generate meaningful statistics on service availability and service gaps, (2) to provide for effective collaboration on behalf of clients, (3) to computerize the state and local community information databases, (4) to compile and distribute a directory of services in print or electronic format, (5) to refer to specialized I&Rs, as defined by the National Alliance of Information and Referral Systems (AIRS) Standards for Professional I&Rs,¹ and (6) to make information in the database available on a Web page on the Internet.

The Coalition proposes a 211 system that is a combination of decentralized and centralized operations. All 211 calls would route directly to an AIRS-certified I&R provider. Under the decentralized portion of the system, all 211 calls during normal working hours would route to the local certified I&R provider. Calls made after hours (including overnight, weekend,

¹

Specialized I&R programs maintain information about community resources that are appropriate for a specific target

and holiday calls), calls left unanswered for six (6) rings by the local I&R provider, calls placed when the local lines are busy and calls from commercial mobile radio services would route to N.H. Helpline, the centralized certified I&R provider. The Coalition proposes a live voice to answer all 211 calls 24 hours a day, 7 days a week, 365 days a year.

The five I&Rs are Monadnock United Way HelpLine, Southern NH Services, Inc. (which comprises Info-Bank Manchester and Info-Bank Nashua), Info Link, Headrest, and N.H. Helpline. Monadnock United Way Helpline and Southern NH Services, Inc. provide coverage to defined areas, served by Verizon, Telecom Data Services (TDS) and Granite State Telephone Company (GST), from 8:30 a.m. to 4:30 p.m. Monday through Friday. Info Link provides coverage to a defined area, served by Verizon, Union Telephone Company (Union) and GST, from 9:00 a.m. to 5:00 pm Monday through Friday. Headrest provides coverage to a defined area, served by Verizon, TDS, and GST, 24/7, 365 days a year. N.H. Helpline provides coverage to a defined area, served by Verizon and all the Independent Telephone Companies (ICOs), 24/7, 365 days a year and would cover the rest of the state when the other I&Rs are not providing coverage.

In order to implement 211 as a combination of centralized and decentralized operations, local exchange carriers will need to program local switches by NXX code, by day of week, and by time of day. A table displaying by NXX, day of week, and time of day where calls to 211 should be routed is available on the Commission's website at <http://www.puc.nh.gov/Telecom/211.htm> and attached to Staff's memo dated August 19, 2004.

The Coalition's request to designate 211 for I&R is consistent with the FCC's

population which link individuals who are in need of specialized services with appropriate resources.

Order. It appears the members of the Coalition have worked collectively to resolve differences that prevented implementation in the past. The proposed combination of centralized and decentralized operations will insure that residents in need of I&R service will have statewide access at all times. We therefore find the designation of the Coalition as the lead implementing agency to be in the public interest.

Pursuant to the FCC's order, state public utilities commissions retain jurisdiction over N11 codes to the extent necessary to ensure that carriers comply with I&R agencies' requests to deploy 211 expeditiously. We encourage wireline and wireless providers to cooperate fully to enable the provision of 211 I&R services to the New Hampshire public.

The Enhanced 911 Commission passed a motion at its June 14, 2002 meeting requesting that it and the Bureau of Emergency Communications be involved in any discussion of N11 requests. Accordingly, we urge the Coalition to use its best efforts to work with the Bureau of Emergency Communications in the development of the 211 service.

Based upon the foregoing, it is hereby

ORDERED NISI, that subject to the effective date below, the petition of the Parties that the New Hampshire Coalition of Comprehensive Information and Referral Services be formally designated as the lead implementing agency for 211 service in New Hampshire is hereby GRANTED; and it is

FURTHER ORDERED, that the New Hampshire Coalition of Comprehensive Information and Referral Services shall assume all costs associated with the development, operation, and maintenance of the 211 service in New Hampshire; and it is

FURTHER ORDERED, that the New Hampshire Coalition of Comprehensive

Information and Referral Services shall use its best efforts to coordinate with other state agencies, the Bureau of Emergency Communications, and the Enhanced 911 Commission in the development, implementation, and operation of 211 service to improve information and referral services in the state; and it is

FURTHER ORDERED, that wireline and wireless providers shall cooperate with the New Hampshire Coalition of Comprehensive Information and Referral Services in its endeavor to provide 211 information and referral services to the public and comply with the New Hampshire Coalition of Comprehensive Information and Referral Services' requests to deploy 211 expeditiously; and it is

FURTHER ORDERED, that the Petitioner shall cause a copy of this Order Nisi to be published once in a statewide newspaper of general circulation or of circulation in those portions of the state where operations are conducted, such publication to be no later than August 30, 2004, and to be documented by affidavit filed with this office on or before September 13, 2004; and it is

FURTHER ORDERED, that all persons interested in responding to this petition be notified that they may submit their comments or file a written request for a hearing on this matter before the Commission no later than September 6, 2004; and it is

FURTHER ORDERED, that any party interested in responding to such comments or request for hearing shall do so no later than September 13, 2004; and it is

FURTHER ORDERED, that this Order Nisi shall be effective September 19, 2004, unless the New Hampshire Coalition of Comprehensive Information and Referral Services fails to satisfy the publication obligation set forth above or the Commission provides otherwise in

a supplemental order issued prior to the effective date.

By order of the Public Utilities Commission of New Hampshire this nineteenth day
of August, 2004.

Thomas B. Getz
Chairman

Graham J. Morrison
Commissioner

Attested by:

Debra A. Howland
Executive Director and Secretary

ORIGINAL

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA 211 PARTNERSHIP, INC.)
TO BE RECOGNIZED AND ENDORSED AS THE)
PROPER ADMINISTRATOR AND SOLE)
AUTHORIZED USER IN INDIANA OF THE 211)
DIALING CODE IN ORDER TO IMPLEMENT A)
STATE-WIDE, NON-COMMERCIAL INFORM-)
ATION AND REFERRAL SYSTEM PROVIDING)
ACCESS TO HUMAN SERVICE PROVIDERS AND)
TO BE GRANTED CERTAIN OTHER RELIEF)
FURTHERING SUCH PURPOSE, INCLUDING)
DESIGNATION AS A "RECOGNIZED 211)
SERVICE PROVIDER" WITHIN THE MEANING)
OF I.C. 8-1-19.5.)

CAUSE NO. 42098

APPROVED: JUN 17 2004

BY THE COMMISSION:

Larry S. Landis, Commissioner

Abby R. Gray, Administrative Law Judge

The Indiana 211 Partnership, Inc. ("IN211") initiated this Cause on October 9, 2001 with the filing of its Petition seeking recognition as the proper administrator of, and the only party authorized to use, the 2-1-1 dialing code within the State of Indiana. In an Interim Order issued on February 20, 2002, the Commission granted IN211 that relief, but made it subject to IN211 making substantial progress toward implementing its planned "2-1-1 System." Pursuant to the Commission's direction, IN211 filed on March 20, 2003 and March 25, 2004 detailed interim reports describing the progress it had made in implementing the planned 2-1-1 System.

Subsequent to IN211's submission to the Commission of its initial progress report on March 20, 2003, the Commission conducted additional proceedings in this Cause relative to rates and charges IN211 would pay to certain telecommunication service providers, as well as certain technical issues encountered by IN211 in connection with the implementation of the planned 2-1-1 System. At the proceeding held on April 19, 2004, IN211 indicated that, in addition to the relief requested in its October 9, 2001 Petition, it wished to be recognized as a "211 service provider" under the recently-enacted provisions of I.C. 8-1-19.5, which becomes effective July 1, 2004. There being no objection, the presiding officers granted IN211's request to expand the scope of the relief at issue in this Cause and issued on April 28, 2004 a docket entry changing the caption to reflect the additional relief requested.

The April 28, 2004 docket entry also scheduled a pre-hearing conference to establish a procedural schedule for the presentation of evidence relative to IN211's request to be recognized as a "211 service provider" and for other related relief. Notice of the scheduled pre-hearing conference was published as required by law and the Commission also directly notified state agencies that may be affected by the Commission recognizing IN211 as a "211 service provider"

under I.C. 8-1-19.5. On May 3, 2004, IN211 filed with the Commission information on its additional efforts to provide notice of the Commission's April 28, 2004 docket entry to numerous local exchange carriers and other telecommunication service providers with which IN211 has had contact, as well as to state agencies that it believed may be affected by IN211's recognition as a "211 service provider."

In accordance with the April 28, 2004 docket entry, the Commission convened a pre-hearing conference on May 12, 2004, beginning at 1:00 p.m. in Room E-306 of the Indiana Government Center South, 302 West Washington Street, Indianapolis, Indiana. In addition to IN211, the Indiana Office of Utility Consumer Counselor (the "Public"), Indiana Bell Telephone Company, Incorporated d/b/a SBC Indiana ("SBC Indiana") and Verizon North, Inc and Contel of the South, Inc. d/b/a Verizon North Systems (collectively "Verizon") appeared and participated at the pre-hearing conference. Representatives from the Governor's Office, Office of Attorney General, Department of Administration, and State Emergency Management Agency, as well as Sprint Communications ("Sprint"), also were in attendance at the pre-hearing conference. No members of the general public, however, appeared or participated.

At the pre-hearing conference the presiding officers granted without objection IN211's request that it be allowed to rely upon the evidentiary record that already had been developed in this Cause since issuance of the Commission's February 20, 2002 Interim Order as its case-in-chief. IN211, however, agreed to designate the portions of the evidentiary record that would constitute its case-in-chief. The parties agreed upon a schedule for other filings and for a public evidentiary hearing.

On May 25, 2004, IN211 filed with the Commission its designation of the evidence of record that constituted its case-in-chief. In addition, IN211 filed on May 25, 2004, a notice concerning its discussions with representatives of state agencies represented at the May 12, 2004 pre-hearing conference.

Pursuant to notice given as provided by law, proof of which was incorporated into the record by reference and placed into the official files of the Commission, a public hearing was held in this Cause commencing at 10:00 a.m. on June 7, 2004, in Room E-306 of Indiana Government Center South in Indianapolis, Indiana. IN211, the Public, SBC Indiana and Verizon appeared and participated at the public hearing.

As provided for at the May 12, 2004 pre-hearing conference, IN211's case-in-chief for the purposes of the June 7 hearing consisted of certain designated portions of the evidentiary record already developed in this Cause since issuance of the Commission's February 20, 2002 Interim Order.

Having considered the evidence, and being duly advised, the Commission now finds:

1. **Notice & Jurisdiction.** Due, legal and timely notice of the May 12, 2004 pre-hearing conference and the June 7, 2004 public hearing were given and published as required by law. IN211, and its provision of 2-1-1 services, is subject to the jurisdiction of the Commission pursuant to I.C. 8-1-19.5. The Commission also has jurisdiction over the subject matter of this

Cause by virtue of those statutes.

2. **Petitioner's Characteristics.** IN211, formed in November, 2000, is an Indiana non-profit corporation recognized as a tax-exempt public charity under Section 501(c)(3) of the Internal Revenue Code. IN211 presently has 32 General Members reflecting a broad coalition of Indiana information and referral ("I&R") service providers, child care referral organizations, agencies on aging, other types of organizations, and governmental agencies such as the Indiana Office of Utility Consumer Counselor. None of IN211's General Members, or IN211 itself, operates for commercial purposes.

3. **Relief Requested.** In addition to a final determination recognizing and endorsing IN211 as the proper administrator of, and the only party authorized to use, the 2-1-1 dialing code within Indiana, IN211 has requested the Commission to recognize it as a "211 service provider" within the meaning of I.C. 8-1-19.5. Enacted during the recently-concluded legislative session by H.E.A. 1344, I.C. 8-1-19.5 will become effective on July 1, 2004. Under that statute, a recognized "211 service provider" is granted certain immunity from civil liability and state agencies that provide human services must consult with it prior to establishing a public telephone line or "hotline" for I&R services. A recognized "211 service provider" also is eligible to receive funding from a 211 services account, which this Commission will administer in accordance with I.C. 8-1-19.5. The 211 services account, however, has not yet received any funding by appropriation or otherwise. Accordingly, the Commission need not address any issues relating to IN211's receipt of any funds from that account at this time. Issues related to administration of the account will be addressed in the future.

The relief considered by the Commission in this Cause has not been limited to recognizing IN211's right to use the 2-1-1 dialing code and as a "211 service provider," but also has included several matters related to furthering IN211's implementation of the 2-1-1 dialing code. Specifically, the Commission has considered, as requested by IN211 in its March 25, 2004 Report, that the Commission reaffirm its jurisdiction over the rates and charges that telecommunications service providers in Indiana charge IN211 in connection with implementation of the planned 2-1-1 System. The Commission also has considered IN211's request in that report that the Commission direct Indiana's telecommunication service providers to maintain policies, procedures and personnel sufficient to support IN211 at the same or higher level than such support is now provided, as well as to investigate ways to reduce or eliminate "phantom calls." Finally, we have considered the request that the Commission direct all telecommunication service providers in Indiana to recognize IN211's exclusive oversight and control of all efforts to disseminate to the public information concerning the availability and use of 2-1-1.

4. **Planned 2-1-1 System.** IN211 based its planned 2-1-1 System on a multiple, linked provider model with strong central oversight and monitoring. IN211's adoption of that model was based on assessments of several structural and operating models for the use of the 2-1-1 dialing code adopted elsewhere in the United States, as well as on an assessment of Indiana's existing I&R infrastructure, the quality and consistency of I&R services in Indiana, funding possibilities, long-term sustainability of a system using 2-1-1 and the feasibility of such a system being able to balance local and statewide priorities.

With the planned system in place, a person needing human services can dial 2-1-1 and the telephone network will route the call to a call center (the "2-1-1 Center") designated by IN211 to serve the caller's area. The receiving 2-1-1 Center will assess the caller's situation and direct the caller to an appropriate human service provider or specialized I&R provider. Existing non-commercial organizations that successfully complete IN211's application, endorsement and contracting process will operate the 2-1-1 Centers. As part of that process, an organization must demonstrate that it can meet the accreditation requirements established by the Alliance of Information and Referral Systems ("AIRS"). The 2-1-1 Centers also must satisfy AIRS' standards in connection with the I&R services they actually provide. The individual 2-1-1 Centers will own and operate all equipment and other facilities necessary to receive and answer calls routed to them. IN211, however, will secure and operate or manage the facilities, equipment and/or services necessary to receive a 2-1-1 call, route it to the appropriate 2-1-1 Center and maintain system-wide interconnectivity.

The planned system will operate on a 24-hour, 365 day a year basis. Also, IN211 will not charge callers for accessing I&R services through the use of 2-1-1, or for the information and/or referrals callers receive. IN211 plans to fund its activities through grants and donations from private and public sources. Implementation of the planned 2-1-1 System is estimated to cost approximately \$3.5 million, which reflects both setup and three years of operating costs. That estimated investment, however, does not reflect investments that have been and will be made by the organizations operating the individual 2-1-1 Centers.

5. **Status of 211 Implementation.** IN211 initially planned to implement its system throughout Indiana in one step, but has adopted an alternate strategy to avoid unduly delaying the availability of 2-1-1 in areas of Indiana where funding and other needed resources are available. IN211's modified strategy allows a fully endorsed 2-1-1 Center that desires to receive 2-1-1 calls to "go live" and receive them. Under this strategy, however, the 2-1-1 Center is responsible for translation and other telecommunications costs, unless IN211 has sufficient resources to pay those costs. Under this alternate implementation strategy, IN211 intends to have the planned 2-1-1 system operational throughout the state by the end of 2006.

To date, IN211 has endorsed six organizations to operate 2-1-1 Centers, which currently receive 2-1-1 calls from 21 counties encompassing over 40% of the state's population. All six operational 2-1-1 Centers have reported increases in calls seeking assistance subsequent to 2-1-1 becoming available, and some are actively considering expanding the geographic areas and populations they currently serve. In addition to the organizations operating the six "live" centers, IN211 has endorsed four other local organizations to operate 2-1-1 Centers. While not yet ready to "go live," each of these additional centers has made significant improvements in their services in anticipation of receiving 2-1-1 calls and satisfying the expectations for a 2-1-1 Center, such as accreditation by AIRS. When these additional centers "go live," 2-1-1 will be available for use in approximately 65 of Indiana's 92 counties, encompassing about 67% of the state's population.

Local organizations potentially qualified to operate 2-1-1 Centers serving the St. Joseph County/Elkhart County area and Monroe, Delaware and Wayne counties have not yet been identified. IN211 is working with organizations in those areas which could qualify to operate a

2-1-1 Center, but has also developed contingent plans to make 2-1-1 dialing available in those areas in the event no local qualified provider is identified. Similarly, IN211 is working with the Indiana State Department of Health's "Indiana Family Help Line" to evaluate whether it could serve rural areas not otherwise served by a local 2-1-1 Center.

Even though IN211 has not yet identified sufficient local qualified 2-1-1 Centers to provide blanket 2-1-1 coverage available throughout Indiana, it has been working with telecommunication service providers to insure that the telecommunication network throughout the state is ready as additional 2-1-1 Centers become operational. In this regard, IN211 has entered into contracts or otherwise made arrangements with Indiana's incumbent local exchange carriers, including the major carriers SBC Indiana, Verizon and Sprint. Under the contracts and arrangements IN211 has in place, 2-1-1 will be translated to an 8YY number or, in certain major metropolitan areas, to a 7-digit number accessing the local 2-1-1 Center. Use of a local 7-digit number allows IN211 to realize savings in connection with its 8YY service. IN211 also is working to increase the availability of 2-1-1 access through business, wireless, and pay telephones.

The necessary translations and other technical work needed to make 2-1-1 available for use generally have been completed smoothly. Many of the routing problems encountered have resolved within a reasonable length of time. However, "phantom" calls remain an issue. A phantom call is a call with no "real" person on the other end, and may occur when switching equipment misinterprets the static or pulses resulting from "misfires," wet lines, open boxes on telephone poles and other causes as "2-1-1 pulses." According to IN211 Witness Lucinda Nord, a certain number of phantom calls were "expected" because "we just know from our experience in other states that phantom calls are inevitable with 211" January 21, 2004 Hearing, Tr. AA-10, ln. 3-10.

Some phantom call problems have had technical solutions, but operational 2-1-1 Centers also have had to use internal telephone features or change internal operating procedures to reduce phantom calls. Ms. Nord testified that IN211 and its centers face higher costs associated with its 8YY service and from other sources as a result of phantom calls. *Id.* at AA-13 to AA15. Also, IN211's March 25, 2004 Report indicates that the process measures monitored as part of a 2-1-1 Center's overall quality assurance efforts are compromised by phantom calls, and phantom calls contribute to a need for additional training, reduced access to I&R services by callers and staff fatigue. See also, January 21, 2004 Hearing, Tr. AA-15.

IN211 has secured grants from public and private sources totaling over \$1,000,000 to fund the telecommunications arrangements it has put in place to make 2-1-1 available and to otherwise fund its activities. Major contributors to IN211's efforts include the Cinergy Foundation, Indiana Association of United Ways, Indiana Family Social Services Administration, Indiana State Department of Health, the Nina Mason Pulliam Charitable Trust and the United Way of America.

On February 11, 2004, IN211 conducted an initial public education campaign in nine cities in order to make known the availability of 2-1-1 through its six operational 2-1-1 Centers. IN211 is also developing a long-term public education plan that will guide future publicity

efforts throughout the state. The plan will include strategies to educate different target audiences about the availability and purpose of 2-1-1. Key messages will likely include differentiating 2-1-1 from 911 and other N-1-1s. The plan also will provide for the conveyance of a consistent image of and messages concerning 2-1-1.

6. **Findings & Conclusions.** This Commission found in its February 20, 2002 Interim Order that implementation of the use of the 2-1-1 dialing code will offer Indiana residents a simpler, more direct way to access needed I&R services. Further, we observed that IN211 presents an opportunity to enhance the value of the 2-1-1 dialing code by implementing its use on a coordinated, statewide basis and under consistent and comprehensive standards designed to assure the receipt of quality services. The model chosen for the planned system also enhances the promise of the 2-1-1 dialing code by allowing current philanthropic investment in local I&R services to be built upon; preserving local input in regard to database development, service delivery and collaboration; balancing local and statewide interests; and developing information that can aid communities and organizations supporting the provision of human services.

The evidence before the Commission continues to support the value of IN211's planned 2-1-1 System, and demonstrates that IN211 has made substantial progress toward system implementation. The 2-1-1 dialing code is currently available for use in a substantial portion of the state, through the efforts of IN211 and the six 2-1-1 Centers already operational. Moreover, the evidence showed that the availability of 2-1-1 will increase to over two-thirds of the state when the four additional 2-1-1 Centers already endorsed by IN211 become operational. While there are areas of the state for which IN211 has not yet identified a local qualified organization to operate a 2-1-1 Center, the evidence demonstrated that IN211 is working assiduously with local organizations in those areas, as well as the Indiana State Department of Health, to fill the need. There is no indication in the evidence that the goal of having the 2-1-1 dialing code in use throughout the state by 2006 is unattainable.

Further, despite not yet having identified a sufficient number of 2-1-1 Centers, IN211 has entered into the contracts, or otherwise made arrangements with incumbent local exchange carriers throughout the state, to have the needed telecommunications infrastructure in place as additional 2-1-1 Centers become operational. Moreover, the evidence showed that IN211's strategy is not only to expand the availability of 2-1-1 geographically, but also to make it available through telecommunication media in addition to the traditional network. IN211 is currently provisioning the 2-1-1 dialing code available through some competitive local exchange carriers ("CLECs") and at least one wireless carrier.

The lack of a sufficient number of qualified local 2-1-1 Centers at this time to serve the entire state does not diminish the progress IN211 has made to implement the planned 2-1-1 System. Witness Nord testified that the absence of more operational 2-1-1 Centers is, at least in part, due to IN211's insistence that 2-1-1 Centers be able to satisfy nationally-recognized standards developed by AIRS. Those comprehensive standards will promote the provision of quality I&R services and assure development of needed information that will further the effective provision of human services within Indiana.

The progress that IN211 has made to date in making 2-1-1 available for use in Indiana,

and the planning and other efforts it has underway to expand that availability, demonstrate that IN211 has the requisite abilities to fully implement the contemplated statewide 2-1-1 System. Further, IN211 has demonstrated an ability to secure significant funding to apply toward the planned 2-1-1 System under its interim strategy. The evidence showed that IN211 has attracted a substantial amount of funding from a combination of public and private sources. The 2-1-1 services account created by I.C. 8-1-19.5 is positioned to provide an additional source of funding for IN211's on-going activities. Finally, no objections have been raised to IN211's planned system, and the other parties to this Cause have not presented any evidence that would counter our conclusion that IN211 is qualified to implement the 2-1-1 system.

In light of the evidence, the determination made in our February 20, 2002 Interim Order that IN211 should be recognized and endorsed as the proper administrator of, and the only party authorized to use, the 2-1-1 dialing code within the State of Indiana is hereby finalized. Further, IN211 is recognized as a 2-1-1 service provider within the meaning of and for all purposes provided for in I.C. 8-1-19.5.

IN211 has indicated that its recognition as the proper administrator of, and the only party authorized to use, the 2-1-1 dialing code within the State of Indiana for purposes of I.C. 8-1-19.5 and otherwise should further its efforts to secure needed funding. Nevertheless, IN211's need for funds to implement the planned system depends to a great extent on the costs of the telecommunication services that make the use of 2-1-1 possible. Many of those services, however, are not competitive offerings; absent the regulatory process before the Commission, IN211 is without an effective means of assuring itself and its funders that the costs it incurs from Indiana's telecommunication service providers are reasonable and otherwise appropriate. Accordingly, as requested by IN211, this Commission hereby reaffirms its jurisdiction over the rates and charges, as well as the terms and conditions for service, applicable to the services that IN211 will require in connection with implementation of the planned 2-1-1 System.

The record indicates that IN211 has enjoyed the cooperation and assistance of many of Indiana's telecommunication service providers in its efforts to date to make 2-1-1 available for use. IN211 will continue to require that technical telecommunication problems be dealt with quickly and effectively by the involved telecommunication provider or providers. The Commission is satisfied that Indiana's telecommunication service providers will maintain policies, procedures and personnel sufficient to support IN211 at the same or higher level of support that has been provided to date. If issues arise with respect to any service provider, including but not limited to competitive local exchange carriers, and inter-exchange carriers, IN211 should first attempt to resolve such issues with the service provider. If such issues cannot be resolved after the good faith efforts of all parties, IN211 or the service provider may find it necessary to bring the issue to the attention of the Commission.

Notwithstanding the cooperation and assistance that IN211 has received from telecommunication service providers to date, IN211 reports that "phantom calls" remain a significant issue for it and affects its ability to make quality I&R services available through the use of 2-1-1. In an effort to address the "phantom call" issue, IN211 has requested the Commission to direct Indiana's service providers to investigate ways to reduce or eliminate "phantom calls" arising from their respective facilities and equipment. There are many service providers within Indiana, and the evidence presented to the Commission does not clearly

demonstrate the extent of the "phantom call" problem. Accordingly, there is no evidentiary basis for the Commission to require all of Indiana's service providers to conduct the requested investigation. However, the evidence does demonstrate the existence of "phantom calls" and their consequences for IN211. The evidence also is sufficient to warrant directing all telecommunication service providers subject to the Commission's jurisdiction to cooperate with IN211's efforts to address the "phantom call" issue it is experiencing. Further, if IN211 requests an investigation in writing, a copy should also be served the Commission's telecommunications director and the OUCC. The service provider should respond in a timely manner to IN211's request in writing, describing the nature of and the results of its internal investigation. The service provider should also serve a copy on the Commission's telecommunications director. If the parties are unable to resolve the issues, one or both should report the same to this Commission for its consideration and possible action.

Further, IN211 has shown that public education efforts will be an important feature of an effective implementation of the planned 2-1-1 System. There is a need to keep the messages about 2-1-1 factual and consistent in order to avoid confusing or misleading the public. Accordingly, if any entity desires to disseminate any information regarding 2-1-1, there should be a panel established consisting of representatives from IN211, Commission staff, the OUCC and the entity involved. The panel should then meet in an attempt to gain consensus on the appropriate dissemination of information regarding the availability and use of the 2-1-1 dialing code. Indiana's telecommunication service providers and state agencies should refrain from publishing or otherwise disseminating information about 2-1-1 to the public without the written approval of the panel.

Finally, at the evidentiary hearing in this Cause, the Commission discussed its desire to receive periodic reports from IN211 containing information regarding the status of operations and updating the implementation of the 2-1-1 system. The reports should also include information regarding the status of the "phantom call" problems. Therefore, IN211 should file with the Commission, and serve on the other parties, status reports every six months.

IT IS THEREFORE ORDERED BY THE INDIANA UTILITY REGULATORY COMMISSION THAT:

1. The Commission hereby makes final its recognition and endorsement of the Indiana 211 Partnership, Inc. as the proper administrator and the only party authorized to use the 2-1-1 dialing code within the State of Indiana that was provided for on an interim basis in its February 20, 2002 Interim Order in this Cause.
2. The Commission hereby recognizes and designates the Indiana 211 Partnership, Inc. as a "211 service provider" within the meaning of and for all purposes provided for in I.C. 8-1-19.5.
3. All telecommunication service providers subject to the Commission's jurisdiction are hereby directed to cooperate fully with IN211's efforts to address the "phantom call" issue. If IN211 requests an investigation in writing, a copy should also be sent to the Commission's telecommunications director and the OUCC. The service provider should respond in a timely

manner to IN211's request in writing, describing the nature of and the results of its internal investigation. The service provider should also serve a copy on the Commission's telecommunications director. If the parties are unable to resolve the issues, one or both should report the same to this Commission for its consideration and possible action.

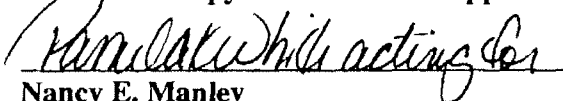
4. There shall be a panel established consisting of representatives from IN211, Commission staff, the OUCC and any entity who may desire to disseminate any information regarding the 2-1-1 System. The panel should meet in an attempt to gain consensus on the appropriate dissemination of information regarding the availability and use of the 2-1-1 dialing code. Indiana's telecommunication service providers and state agencies should refrain from publishing or otherwise disseminating information about 2-1-1 to the public without the written approval of the panel.

5. IN211 shall file with the Commission and serve on the other parties reports every six months containing information regarding the status of operations and updating the implementation of the 2-1-1 system. The reports shall also include information regarding the status of the "phantom call" problems.

6. This Order shall be effective on and after the date of its approval.

McCARTY, HADLEY, RIPLEY, AND ZIEGNER CONCUR; LANDIS ABSENT:
APPROVED: JUN 17 2004

I hereby certify that the above is a true
and correct copy of the Order as approved.



Nancy E. Manley
Secretary to the Commission

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on January 23, 2002

COMMISSIONERS PRESENT:

Maureen O. Helmer, Chairman
Thomas J. Dunleavy
James D. Bennett
Leonard A. Weiss
Neal N. Galvin

CASE 00-C-1749 - In the Matter of Implementation of N-1-1
Abbreviated Dialing Codes and Assignment of
Vertical Service Codes.

CASE 00-C-1096 - Petition of Chevra Hatzalah, Inc. for
Assignment of a Vertical Service Code.

ORDER DENYING PETITION FOR VERTICAL SERVICE CODE ASSIGNMENT
AND DIRECTING CONTINUED STUDY OF N-1-1 ISSUES

(Issued and Effective February 7, 2002)

BY THE COMMISSION:

INTRODUCTION

N-1-1 codes are easy to use, easy to remember, abbreviated dialing arrangements that allow telephone users to place calls by dialing only three digits. N-1-1 codes are scarce public resources as there are only eight possible N-1-1 codes available under the North American Numbering Plan. In New York State, the 4-1-1, 6-1-1, 7-1-1, 8-1-1, and 9-1-1 codes have been in general use for several years. In 1997, the FCC assigned the 3-1-1 code for access to non-emergency police or other governmental services.¹ In 2000, the FCC assigned the 2-1-

¹ CC Docket No. 92-105, FCC 97-51, First Report and Order and Further Notice of Proposed Rulemaking, Released February 19, 1997.

DISCUSSION

N-1-1 Abbreviated Dialing Codes

The primary issues concerning the implementation of N-1-1 abbreviated dialing codes are:

- 1) which entities should provide the services;
- 2) which carriers (landline, payphone, or wireless) should modify their networks to assure appropriate call origination and completion, and what will such modifications cost initially and over time;
- 3) who should pay for these costs;
- 4) what should callers be charged for the calls that they originate; and
- 5) what, if any, funding should be provided to support the implementation of N-1-1 services.

Each of the N-1-1 codes at issue (2-1-1, 3-1-1 and 5-1-1) are discussed separately below.

2-1-1 Community Information and Referral Services

The FCC found that there was a need for a nationwide assignment of the 2-1-1 code to provide public access to information and referral to community service organizations. In New York State, an organization known as the "2-1-1 New York Collaborative" (the Collaborative) requested assignment of the 2-1-1 code for New York State. Based on the comments received, it appears that there is unanimous support for assignment of this code to the Collaborative so that they may begin to make specific plans and establish a schedule for implementing 2-1-1 service in New York State.

Implementation of 2-1-1 will require network modifications to assure appropriate call origination. Most parties support measures to require that all landline carriers

that are subject to our regulation make the necessary network modifications to ensure that their customers can complete 2-1-1 dialed calls. Wireless carriers, which are not generally subject to our regulation, are reluctant to make any detailed geographically-based network modifications, but expressed a willingness to route 2-1-1 calls to a single statewide call center. The wireless carriers are encouraged to enable their customers to complete 2-1-1 dialed calls in order to satisfy the anticipated demand for Information and Referral service. This issue will be visited in the future after the public has become accustomed to using the 2-1-1 code.

Most parties assert that implementation costs could be minimized if the telephone companies translate the 2-1-1 dialed calls into a toll free number and then route the calls to either a single statewide call center or to one of several regional centers. The consensus among the parties was that the costs of these relatively minor network modifications and translations should be paid for by the carriers, and the carriers would then charge the Collaborative for each incoming call, similar to the way in which 800-like toll free service currently operates. The Collaborative should consider establishing either a single statewide 2-1-1 call center or several regional centers to simplify the required network modifications and facilitate service deployment.

No party strongly favors the allocation of Targeted Accessibility Fund (TAF) resources to fund 2-1-1 service. Many parties assert that the funding necessary to support the implementation of 2-1-1 should be provided through a public/private sector partnership. Verizon New York Inc. states that the parties requesting the activation of any N-1-1 code should bear the responsibility for the cost of establishing the

service. Further exploration and consideration of the funding issues is necessary.

The Collaborative is the appropriate entity to coordinate the 2-1-1 system in New York. Staff shall continue to work with the Collaborative, the New York State Telecommunications Association, and the carriers to resolve specific implementational issues related to the establishment of 2-1-1 service where necessary and appropriate.

3-1-1 Non-Emergency Police/Governmental Services

The FCC has determined that the 3-1-1 code must be provided to any municipality desiring to use it for access to non-emergency police or other governmental services. The municipalities have the discretion to determine whether they should utilize 3-1-1 or rely on existing local telephone numbers. Thus, there are no outstanding issues to be resolved concerning which entities should be assigned the 3-1-1 abbreviated dialing code. In January 2001, the City of Rochester became the first municipality in New York State to use the 3-1-1 abbreviated dialing code to provide access to non-emergency police services. A number of other New York State municipalities, including several large cities, are currently considering establishing 3-1-1 service.

Most carriers comment that the implementation issues associated with 3-1-1 are more complicated than those associated with 2-1-1 or Enhanced 9-1-1 because 3-1-1 service would probably be provided by individual municipalities rather than counties⁴. Sprint Communications Company L.P. and Sprint Spectrum L.P. dba Sprint PCS (collectively Sprint) recommends

⁴ Enhanced 9-1-1 service is provided on a county-wide basis. It is anticipated that 2-1-1 service would be provided on a state-wide basis.

the implementation of a single statewide toll free (800 or similar) number for the routing 3-1-1 calls. Implementation on a localized basis would probably require more complex and labor intensive translation costs. The City of Rochester Police Department (RPD) recognizes these additional complications and sees the need for regulatory intervention by the Commission because multiple governmental agencies within a carrier's service area might request the activation of the 3-1-1 code and most carrier networks do not conform to municipal boundaries. RPD believes that engineering solutions that will selectively route calls to the proper government entity will eventually be required. Most carriers seem willing to provide 3-1-1 service if they do not have to incur any unreasonable costs. Staff shall continue to work with the appropriate entities toward resolving specific implementational issues where necessary.

The RPD believes that local governments should not be forced to pay for the network modifications because these types of services may best serve urban areas that are experiencing reduced tax revenue collections. RPD is the only party advocating that TAF funds be used, arguing that properly functioning 3-1-1 systems will result in fewer calls being placed to 9-1-1, which is funded in part by the TAF.

Staff shall continue to work with the City of Rochester and the telecommunications industry to resolve any outstanding issues and provide similar assistance to other municipalities that are planning to establish 3-1-1 service.

5-1-1 Travel and Traffic Information Services

The FCC has assigned the 5-1-1 code to provide public access to travel and traffic information. Similar to the issues associated with 2-1-1, there is a need for designation of assignment for coordination of 5-1-1. Based on the comments

received, it appears that there is substantial support from the landline telephone industry for designating the New York State Department of Transportation (NYSDOT), with its statewide focus and authority, as the appropriate entity to establish 5-1-1 service. However, several wireless carriers believe that the Commission should refrain from determining the appropriate agency until the FCC makes a final determination in their pending Petition for Reconsideration regarding the 5-1-1 code. NYSDOT is investigating whether it should request formal administrative authority to administer 5-1-1 independently or with an advisory committee. As detailed information concerning what resources will be needed is not yet available, NYSDOT is interested in continuing discussions with staff and other interested parties to explore the implications of taking on this new responsibility. NYSDOT is not prepared to assume the costs for 5-1-1 service in order to provide a free service to travelers and shippers. However, it may agree to subsidize some costs.

The implementation of a 5-1-1 system may be considerably more complex than either 2-1-1 or 3-1-1 because 5-1-1 will offer the caller certain options concerning the type of information to be obtained. Staff shall continue to stay involved with the planning process for 5-1-1.

Vertical Service Codes

In June 2000, Chevra Hatzalah, Inc., a private volunteer ambulance service, requested the assignment of a VSC to provide its callers with easy to remember, easy to use access to its emergency medical services. The primary issues to be considered in evaluating the feasibility of assigning VSCs to private companies and for similar purposes are:

- 1) the effects on carrier networks;
- 2) the impact on finite numbering resources;
- 3) the impact on existing 9-1-1 Emergency Telephone Service; and
- 4) the cost of assigning such numbers.

Chevra Hatzalah, Inc., argued in its petition that an abbreviated number would enhance its ability to provide emergency services to callers. It did not file comments to the March 2001 Notice. With one exception, all parties that did file comments strongly opposed assigning VSCs for call completion purposes and pointed out that VSCs are generally used to activate custom calling features such as call waiting and call forwarding. VSCs are coordinated on a national basis and assigned by the North American Numbering Plan Administrator. Although VSCs are sometimes used to complete certain calls on the wireless network, no carrier was aware of any use of a VSC for landline call completion purposes. Only PSComms favored the assignment of a VSC to complete calls to a private emergency services provider. Another party opined that it might be more appropriate to assign a VSC to ambulance services in general, rather than to a specific company. This could, however, result in substantial network routing costs, similar to 9-1-1.

Most of the parties were strongly opposed to such assignment and several parties raised jurisdictional concerns claiming that such an assignment of a scarce resource is the responsibility of the North American Numbering Plan Administrator and the FCC, not the individual states. VSCs are used by landline carriers to activate custom calling features and industry consistency is important to minimize customer confusion. One party opposed the assignment of VSCs except through commercial arrangements. Others are concerned that

since VSCs are a scarce resource, it would not be practical to assign one to a service that only a limited number of customers would use.

Several parties raised concerns about the possible negative impact that assigning a VSC for such purposes would have on the existing 9-1-1 emergency telephone number systems, both wireline and wireless. The New York State Police and the Director of the Chemung County Office of Fire and Emergency Management (Chemung OFE) argue that 9-1-1 should be the standard number for reporting all emergencies in New York State. Chemung OFE also believes that assigning VSCs to private parties would cause the carriers to incur higher costs that would only be passed along to consumers. We share the concerns of the commenting parties regarding the adverse impact such an assignment would have on North America's finite numbering resources and the existing 9-1-1 emergency telephone number systems.

Based on the comments, there is little support in the telecommunications industry or elsewhere for assigning a VSC to originate calls to a private volunteer ambulance or other emergency service provider; nor is there any support to assign any VSCs for similar call origination purposes. Staff shall assist any private volunteer ambulance services in obtaining other easy to remember easy to use numbers (such as 800 type toll free numbers) to provide access to their emergency medical services, if requested.

CONCLUSION

Based on the comments received in this proceeding, the implementation of the 2-1-1, 3-1-1, and 5-1-1 codes is encouraged when and where appropriate. Staff shall continue to provide assistance in resolving implementational issues between

the entities seeking to implement N-1-1 codes and the telecommunications carriers. There is little support for assigning Vertical Service Codes to provide access to a private volunteer ambulance service's emergency medical services or for similar call completion purposes. Accordingly, the petition for assigning a VSC for call completion purposes is denied.

The Commission orders:

1. The petition of Chevra Hatzalah, Inc. for assignment of a Vertical Service Code is denied.
2. Staff is directed to continue collaboration with interested parties on N-1-1 issues and to report back to the Commission as issues are resolved.
3. These proceedings are continued.

By the Commission,

(SIGNED)

JANET HAND DEIXLER
Secretary

STATE OF VERMONT
PUBLIC SERVICE BOARD

Docket No. 7012

Petition of The United Way's of Vermont,)
pursuant to Board Rule 7.300, for designation)
as the 2-1-1 service manager for the State of)
Vermont)

Order Entered: 11/19/2004

I. INTRODUCTION & PROCEDURAL HISTORY

On August 26, 2004, The United Way's of Vermont ("UWVT") filed a petition ("Petition") with the Public Service Board ("Board") requesting designation as an N11 service manager in Vermont pursuant to Board Rule 7.300. This Proposal for Decision recommends that the Board designate UWVT as the service manager for 2-1-1 service throughout Vermont ("VT 2-1-1").

On October 26, 2004, I convened a prehearing conference in this proceeding. Appearances were entered by: June Tierney, Esq., for the Vermont Department of Public Service ("Department"); and Suzanne M. Monte, Esq., of Downs Rachlin Martin PLLC for UWVT. None of the prehearing conference participants sought evidentiary hearings on UWVT's request for designation as service manager pursuant to Board Rule 7.300. On October 27, 2004, UWVT and the Department filed a joint proposal for decision. The parties have waived service of this Proposal for Decision provided it is consistent in all material respects with their proposal for decision.

II. FINDINGS OF FACT

I present the following Findings of Fact to the Board, in accordance with 30 V.S.A. § 8.

A. Introduction and Background

1. UWVT is a non-profit corporation duly organized and existing under the laws of the State of Vermont. Pet. at 1.

2. The Federal Communications Commission has non-exclusive jurisdiction over N11 or service codes and has nationally assigned 2-1-1 as the service code to be used to provide access to community information and referral services. *Id.*; Kraft pf. at 3.

3. The Board has jurisdiction over local administration of N11 codes, except as otherwise provided by federal law, which it exercises pursuant to Board Rule 7.300. Pet. at 1; Kraft pf. at 3.

4. UWVT requests that the Board designate it, under Board Rule 7.300, as the 2-1-1 service manager throughout the entire State of Vermont. Pet. at 1.

5. UWVT intends to use the 2-1-1 code to provide individuals and families with information about and referrals to health and human service organizations and volunteer opportunities by dialing 2-1-1. *Id.*; Kraft pf. at 3.

6. The basis for VT 2-1-1 will be the existing United Way GET INFO service, which is the health and human services information and referral program currently sponsored by UWVT serving much of Vermont during regular business hours. Kraft pf. at 3.

7. United Way GET INFO also responds to calls to the former Vermont Agency of Human Services Parents Assistance Line. *Id.*

8. UWVT plans to expand and enhance United Way GET INFO to serve the entire State of Vermont, 24 hours a day, 7 days a week as VT 2-1-1. *Id.*

9. The VT 2-1-1 referral database will be comprised of programs and services throughout Vermont that meet the following VT 2-1-1 Database Inclusion/Exclusion Policy:

To be included in the Vermont 2-1-1 database, an organization or individual service provider must meet all three of the following general terms of inclusion:

- (1) provides a health or human service for residents of Vermont;
- (2) is licensed or certified, when applicable; and
- (3) has a consistently available contact person, location and telephone number.

Access through an answering machine is acceptable; and Services that are available only to members of a certain group or affiliation and organizations that promote or deliver illegal services will not be included in the database.

Id.

10. UWVT will formally collect and update (at least annually) information about programs and services in accordance with the *Standards for Professional Information and*

Referral, Requirements for AIRS Accreditation and Operating 2-1-1 Systems, published by the Alliance of Information and Referral Systems ("AIRS") (the "*AIRS Standards*"). *Id.* at 6.

11. The VT 2-1-1 data manager will use information from agency survey forms and other materials provided by authorized agency representatives, to develop a standardized profile for each organization in the database. *Id.*

12. VT 2-1-1's referral protocols and procedures are based on the *AIRS Standards*. *Id.*

13. Referrals will be provided by trained Information and Referral specialists ("I&R specialists") according to the specific needs of the inquirer, eligibility criteria, geographic proximity, and caller preference, which will be determined through an assessment during the call. *Id.*

B. Board Rule 7.303 Criteria

(1) UWVT Organizational Structure And Management

14. UWVT is a Vermont non-profit corporation. *Id.*; exhs. UWVT-1 (Articles of Association), UWVT-2 (Bylaws), UWVT-3 (organizational chart).

15. United Way organizations in the State of Vermont and states contiguous to Vermont are eligible to become members of UWVT. Kraft pf. at 9.

16. UWVT's Board of Directors is comprised of the executive directors of its member United Way organizations. *Id.* at 10; exh. UWVT-4.

17. The UWVT Board of Directors receives recommendations from the VT 2-1-1 Advisory Board (the "Advisory Board") in executing contracts, submitting grant applications, developing partnerships, and making decisions regarding the development and operation of VT 2-1-1; the Advisory Board meets regularly to review the progress of the 2-1-1-development effort and will continue to work closely with UWVT to oversee VT 2-1-1 operations once implemented. Kraft pf. at 10.

18. The Advisory Board's membership is comprised of representatives from a variety of public and private organizations, including the Agency of Human Services, Department of Health, Department of Aging and Independent Living, Enhanced 9-1-1, Council on Aging for Southeastern Vermont, Association of Vermont Telcos, IBM and various United Ways. *Id.*; exh. UWVT-5.

19. The Advisory Board is elected by the VT 2-1-1 Collaborative (the "Collaborative"). Kraft pf. at 11.

20. The Collaborative's membership is made up of a broad-based association of individuals and organizations, including, in addition to the organizations listed above, the Vermont Center for Independent Living, Battered Women's Services and Shelter, Vermont Child Care Providers Association, Vermont Network Against Domestic Violence and Sexual Assault, and Area Agency on Aging for Northeastern Vermont, among others. *Id.*; exh. UWVT-6.

(2) Technical and Managerial Expertise

21. UWVT's Board of Directors, the Advisory Board and the Collaborative are comprised of persons with significant experience in the development and management of community information systems, providing sufficient technical and managerial expertise to administer the service. Kraft pf. at 11; exhs. UWVT-4, UWVT-5, UWVT-6.

22. The two staff persons supporting the VT 2-1-1 development effort also have significant experience in information and referral services and currently support United Way GET INFO. Kraft pf. at 11.

23. Because VT 2-1-1 is a project of UWVT, its personnel will have direct access to the resources of United Way of America ("UWA"), which was one of the original petitioners to the FCC for 2-1-1 designation and has made 2-1-1 a priority for itself and its member organizations. *Id.* at 12-13.

24. The National 2-1-1 Collaborative also offers a network of established and emerging 2-1-1 initiatives. *Id.* at 13.

25. UWVT also benefits from AIRS, the international professional membership organization of community information providers. *Id.*

26. United Way GET INFO is a member of AIRS. *Id.*

27. Participants in the VT 2-1-1 development effort have attended AIRS' annual education conferences, including the National 2-1-1 Institute, an intensive training for those developing and implementing 2-1-1 services nationwide. *Id.*

28. United Way GET INFO is also a founding member of the Vermont Alliance of Information and Referral Services ("VT-AIRS"), the Vermont affiliate of AIRS, which was

established in August, 2000, to support information and referral professionals in Vermont through training, advocacy and networking. *Id.*

29. Representatives from E 9-1-1 and the Agency of Human Services ("AHS") are working members of the VT 2-1-1 effort. *Id.* at 14.

30. The State of Vermont's Parent Assistance Line has been moved to 2-1-1. *Id.*

(3) Sufficient and Stable Source of Funding

31. UWVT has had sufficient and stable funding for the development phase of VT 2-1-1 and anticipates the continuation and expansion of these sources for its operation. *Id.*

32. AHS has provided grants to UWVT to develop a statewide database, including web access for professionals and the general public. *Id.*

33. As of July 2004, the 2-1-1 database contained 552 agencies and over 1,281 programs statewide; by September, 2004, the goal was to complete the annual formal update of agency and program information and by February, 2005, to expand the database to 700 agencies and over 1,500 programs. Web access to the database became available in October, 2003. *Id.*

34. VT 2-1-1 representatives are working closely with AHS and Vermont Department of Public Safety officials to direct existing resources that are currently being used to provide information and referral through various AHS departments or that are in the planning stage for homeland security purposes toward the centralized VT 2-1-1 call center; UWVT expects this redirection and new focus of funding will be the primary source of revenue for VT 2-1-1. *Id.* at 15.

35. VT 2-1-1 has negotiated an informal agreement with IBM for an in-kind contribution of the hardware necessary for operation, including computers, printers, and a file server. *Id.*

36. VT 2-1-1 has received grants from the Verizon Foundation, Vermont Community Foundation, Fletcher Allen Community Health Foundation, United Way's of Vermont, and the five Area Agencies on Aging for start-up and database development efforts. *Id.*

37. United Way GET INFO receives funding and in-kind support from Fletcher Allen Community Health Foundation, Fanny Allen Foundation, Champlain Initiative, several Windham County cities and towns, and the United Ways of Addison, Chittenden Franklin/Grand Isle, and Windham Counties; several additional grants are pending. *Id.* at 15-16.

38. VT 2-1-1 has contracted with a professional grant writer to research and obtain additional grant funding. *Id.* at 16.

39. Comprehensive information and referral programs often provide contracted information and referral services for state agencies and community organizations, such as United Way GET INFO's current contract with the Vermont Department of Health to receive \$1,500 to provide information, referrals and mailed materials for the SMILE VT Project to increase access to dental care for families with children. *Id.*

40. For the past two years, United Way GET INFO has had contracts with two regional partnerships, the Champlain Initiative and Alliance for Building Community, to provide services for Dr. Dynasaur children's health insurance outreach. *Id.*

41. UWVT anticipates assuming these United Way GET INFO contracts when the VT 2-1-1 service becomes operational. *Id.*

42. UWVT received a grant from UWA last year for emergency planning as part of the VT 2-1-1 development funding. *Id.* at 17.

43. UWA is also working to secure resources and support for individual 2-1-1 operations across the country, such as VT 2-1-1. *Id.*

44. Individual United Way organizations comprising UWVT have committed to provide the community outreach function of VT 2-1-1 and are developing a protocol for designating community contributions to VT 2-1-1. *Id.*

45. The United Way of Chittenden County, which merged its countywide GET INFO Champlain Valley with the United Way of Windham County's Help-Line to form United Way GET INFO, has donated its information and referral software, to VT 2-1-1 and continues to make a significant contribution to the project's development and implementation; the United Way of Windham County has also provided administrative support to the VT 2-1-1 project. *Id.* at 18.

46. The framework for VT 2-1-1 is already in place with United Way GET INFO. *Id.* at 19.

47. UWVT projects financial need for the expansion of the existing United Way GET INFO into a statewide, 24-hour service to be between \$150,000 and \$200,000, with annual

operating costs after start-up to be between \$300,000-\$550,000 (increasing as the call volume and the number of I&R specialists needed increases). *Id.*; exh. UWVT-7.

48. These estimated costs are below or in-line with national projections that a fully functioning 2-1-1 call center should cost between \$1.00-\$1.50 per capita. Kraft pf. at 19.

(4) Implementation Date that Affords Affected Entities Sufficient
Time to Undertake Necessary Implementation Arrangements

49. The proposed implementation date of a soft launch on February 1, 2005, with a full kick-off on February 11, 2005, provides affected entities with sufficient time to undertake necessary implementation arrangements. *Id.*¹

(5) Plan for Coordination of Services With Other N11 Service Managers,
Which Plan Demonstrates the Proposal Will Not Cause Any Undue
Technical Difficulty for Telephone Operators

50. UWVT and the Vermont Enhanced 9-1-1 Board have developed a Collaboration Plan for coordination between UWVT and the Vermont Enhanced 9-1-1 Board during the planning, implementation, and on-going operational phases of VT 2-1-1, and plan to work closely together in the areas of consumer education, emergency calls made to 2-1-1, and emergency awareness training. *Id.* at 20.

51. The Collaboration Plan establishes the structure and mechanisms for collaboration, including: contact list of all persons involved; roles and responsibilities; key dates; deliverables; escalation procedures/issue resolution; project tracking; and meeting schedule. *Id.*

52. The anticipated outcome of the Collaboration Plan is collaborative consumer education that will minimize the risk of persons calling the wrong N11 number in an emergency; development and implementation of policies, procedures and standards for handling emergency calls received by the 2-1-1 call center; and emergency awareness training for the 2-1-1 staff. *Id.* at 21.

1. UWVT's initial filing indicated a January 1, 2005, soft launch date. At the Prehearing Conference, UWVT amended its proposal to a soft launch date of February 1, 2005. The full kick-off date of February 11, 2005, remains unchanged.

53. UWVT has also coordinated its plans for 2-1-1 with the Vermont Agency of Transportation ("AOT") — the party designated as the service manager for 5-1-1 throughout Vermont — and plans to attend quarterly "stakeholder" meetings held by the AOT. *Id.*

54. UWVT has made initial contact with a representative for 7-1-1 to discuss any potential coordination issues; upon designation as the 2-1-1 service manager, UWVT and 7-1-1 representatives plan to meet again to develop a plan for coordination of services. *Id.*

55. When VT 2-1-1 receives misdirected calls that should have gone to one of the other N11 services, its operators will refer callers to the services provided by other N11 numbers according to established protocols. *Id.*

56. Since all 2-1-1 calls will be answered at a single location in Vermont and 2-1-1 implementation only requires a one-time switch by telephone companies to a 10-digit toll-free number, there will be no undue technical difficulty for telephone companies. *Id.* at 22.

(6) Plan for Public Education to Avoid Customer Confusion

57. UWVT has developed a plan for public education about the use of 2-1-1 to avoid customer confusion. *Id.* at 22-26.

58. UWVT's detailed marketing plan will launch VT 2-1-1 state-wide through a collaborative marketing, communications and public education effort. *Id.* at 22; exh. UWVT-8.

59. The marketing campaign will target the entire state and all demographics, and will use a multi-message, multi-media campaign using rotating messages on mass transit posters, radio, public television and points of population, such as hospitals, schools, agencies, and corporate posters. Kraft pf. at 23-24.

60. UWVT plans to leverage the experience of other states in marketing their 2-1-1 services; UWVT has also received recommendations from the national 2-1-1 organization. *Id.*

(7) Technical Proposal That Is Consistent With Board Rule
7.303B for Routing N11 Calls

61. UWVT's technical proposal is consistent with the provisions of Public Service Board Rule 7.303B for routing N11 calls. *Id.* at 26.

62. The use of a three-digit dialing code, such as 2-1-1, requires an underlying or 800 "Termination Number" in order to function correctly and ensure that all calls made to the three-digit code end up at the proper number. *Id.*

63. UWVT will provide telephone service providers with an 800 number and in turn the telephone service providers will point any 2-1-1 calls to the 800 number through the use of a translation in their switches. *Id.*

64. UWVT proposes to serve the entire State of Vermont from a centralized location; calls will not be routed to areas smaller than, or with boundaries inconsistent with, existing exchange boundaries or wireless coverage areas. *Id.*

65. UWVT has worked with each Vermont independent telephone company through the Telephone Association of Vermont ("TAV") to discuss the technical aspects of UWVT's proposal and to ensure that the proposal meets the provisions of Public Service Board Rule 7.303B. *Id.* at 27.

66. UWVT and Verizon are negotiating an agreement for switching and on-going operation, management and oversight. *Id.*

67. UWVT is in the process of contacting wireless carriers to discuss serving arrangements. *Id.*

(8) Mechanism for Telephone Companies to Recover Costs Associated
With the 2-1-1 Service

68. UWVT plans to work with individual telephone companies in connection with the implementation of 2-1-1 service and the costs associated with performing the switch translations: the independent telephone companies have agreed to execute the translations and invoice UWVT on a time-and-materials cost basis; UWVT and Verizon are negotiating an agreement that includes a one-time fee to cover the switch translation, as well as on-going operation, management and oversight costs; UWVT is in the process of contacting wireless carriers to discuss charging requirements. *Id.*

(9) Operational Plan For Ensuring Availability Of 2-1-1 Service 24 Hours
Per Day, 7 Days Per Week

69. VT 2-1-1 will operate as a single, centralized health and human service information and referral center 24 hours per day, 7 days per week, in compliance with the *AIRS Standards* national guidelines of 24-hour, 7-day telephone coverage by live operators. *Id.* at 28.

70. Staffing for the first year after implementation of VT 2-1-1 will include four to eight full-time positions: a program director; data manager; one to three telephone I&R specialists; and one to three regional data representatives, depending on the call volume; all staff members will be qualified to answer calls in order to handle increased call volume during peak hours. *Id.*

71. UWVT will utilize one of the following options to handle overflow calls: automatic call distributor which automatically puts the person in a queue when all agents are busy; rollover to message machine and return call as soon as the first agent is free; or agents handle a call coming into a rollover line by asking the person on the first line (not in crisis situation or dealing with strong emotions) to hold for a few seconds while the agent gets the phone number of the next caller for a call back (the third option is currently successfully utilized by United Way GET INFO, when necessary). *Id.*

72. VT 2-1-1 staff will handle calls Monday through Friday, 8:00 a.m. to 8:00 p.m. *Id.* at 29.

73. After-hours, weekends, and holiday coverage will be contracted to an organizational partner that provides information and referral services in compliance with *AIRS Standards*. *Id.*

74. UWVT is considering a partnership with United Way of Connecticut Infoline 2-1-1, a highly professional agency and leader in the national 2-1-1 initiative for after-hours coverage, which will include remote access to the VT 2-1-1 resource database and client data entry system – using technology UWVT now has in place – and training in Vermont resources and networks for the Connecticut Infoline 2-1-1 caseworkers by VT 2-1-1 staff. *Id.*

75. VT 2-1-1 is in the process of developing a written emergency plan that will describe the incident command system; address the safety and well-being of staff and their families; clarify the role of VT 2-1-1 before, during, and after community emergencies and disasters;

provide for temporary relocation of operations; and describe the steps needed to resume service as quickly as possible in the event of a disruption of service. *Id.* at 30.

(10) Service Quality Proposal for Measuring Performance

76. UWVT's performance as the 2-1-1 service manager will be determined based on the *AIRS Standards*. *Id.*

77. During the first year of operation of VT 2-1-1, UWVT will measure the quantity and quality of the VT 2-1-1 service delivery, the resource database, reports and measures, cooperative relationships, and organizational requirements according to the service quality measurement plan attached to its petition as Exhibit UWVT-9. *Id.*; exh. UWVT-9.

78. This service quality measurement plan is based on the *AIRS Standards*, which includes outputs and outcomes to be measured; specific indicators; data sources; methods of data collection; who manages the data and how; and who collects the data, how and when. Kraft pf. at 30.

79. The results of these quality assurance procedures will be reported by the program director to the UWVT Board of Directors and the VT 2-1-1 Advisory Board on a quarterly basis. *Id.*

(11) Existence of Another 2-1-1 Service Manager

80. No other service manager is currently designated for 2-1-1 service in Vermont. *Id.*

(12) Proposal is Practical, Cost-Effective and Consistent With the Public Interest

81. UWVT's proposal is practical, cost-effective and consistent with the public interest because it will provide an easy to remember, easy to use, abbreviated dialing code that will enable persons in need to obtain free information and referrals to human service organizations, including community-based and faith-based organizations and government agencies. *Id.*

82. VT 2-1-1 will connect individuals and families with organizations that address community needs, such as adequate and stable housing, utility and food assistance, hospice services, services for the aging, programs for substance abuse, physical or sexual abuse, or

domestic violence, day-care, after school and summer activities, job training and assistance, and disaster recovery. *Id.*

83. VT 2-1-1 will also be an information and referral resource for individuals seeking to volunteer and become involved with their communities. *Id.* at 31-32.

84. The proposed VT 2-1-1 system is practical because it leverages existing information and referral expertise and infrastructure already in place with the United Way GET INFO service. *Id.* at 32.

85. VT 2-1-1 is cost effective because it provides a single repository where comprehensive data on all community services is collected, maintained, and updated regularly, reducing costs and duplication of effort. *Id.*

86. VT 2-1-1 is consistent with the public interest because it provides an easily remembered, accessible entry point to community information and referral services, connecting individuals and families with precise information and social services that address their specific needs, as well as volunteer opportunities. *Id.*

III. CONCLUSION

Board Rule 7.300 requires entities seeking designation as an N11 service manager in Vermont to file a petition with the Board.² The petition must identify the N11 code and the proposed geographic area coverage, and describe the use for the code. In addition, the petitioner is required to provide additional information in order to demonstrate compliance with certain prescribed standards. The standards include: a description of the petitioner's organizational structure; sufficient managerial and technical expertise; a stable funding source; a feasible implementation date; a workable plan for coordination with other N11 service managers in the area; a plan for public outreach; a proposal for routing the N11 calls; a proposal for the mechanism by which the telephone companies will recover costs associated with the system implementation; twenty-four-hour a day availability; and a plan to ensure service quality. Based on the findings above, I conclude that UWVT has demonstrated that it will meet the standards required by Board Rule 7.300. In addition, no party has raised an objection to UWVT's designation as the 2-1-1 service manager throughout Vermont. Accordingly, I recommend that

² Board Rule 7.300 at 7.303C.

the Board designate UWVT as the service manager for 2-1-1 services throughout the State of Vermont, subject to the conditions listed on Attachment A to the Joint Proposal for Decision.

The parties have waived their rights under 3 V.S.A. § 811, to file exceptions and present briefs and oral arguments.

DATED at Montpelier, Vermont, this 19th day of November, 2004.

s/Gregg C. Faber
Gregg C. Faber
Hearing Officer

IV. ORDER

It Is Hereby Ordered, Adjusted, and Decreed by the Public Service Board of the State of Vermont that:

1. The Hearing Officer's findings, conclusion, and recommendations are adopted.
2. The United Way's of Vermont is designated as the service manager for 2-1-1 services throughout the State of Vermont subject to the following conditions:

A. The Vermont 2-1-1 Advisory Board ("Advisory Board") and the Vermont 2-1-1 Collaborative, which oversee and provide recommendations to UWVT in connection with Vermont 2-1-1, shall be comprised of representatives from a broad base of individuals and organizations, including state agencies, community organizations, and corporations. A seat for a representative from the Vermont Agency of Human Services ("AHS") shall be reserved on both the Vermont 2-1-1 Advisory Board and the Vermont 2-1-1 Collaborative.

B. If the Advisory Board determines that AHS, or another entity, is the best organization to serve as the 2-1-1 service manager, and that entity has the capacity and resources to administer and operate the program, UWVT will work with the Advisory Board and the entity to transfer administration and operation of 2-1-1 to that entity.

C. Vermont 2-1-1's referral protocols and procedures will be based on the *Standards for Professional Information and Referral, Requirements for AIRS Accreditation and Operating 2-1-1 Systems*, published by the Alliance of Information and Referral Systems (referred to herein as the "*AIRS Standards*"). Referrals will be offered according to the specific needs of the inquirer, eligibility criteria, geographic proximity, and caller preference – all of which will be determined through an assessment during the call. Where possible and desirable, at least three referrals will be provided to give the inquirer a choice. If services sought by the inquirer are unavailable from service organizations, the Vermont

2-1-1 Information and Referral ("I&R") specialist shall help the caller locate alternate resources.

D. The Vermont 2-1-1 Database Inclusion/Exclusion Policy currently states: "To be included in the Vermont 2-1-1 database, an organization or individual service provider must meet all three of the following general terms of inclusion:

- (1) provides a health or human service for residents of Vermont;
- (2) is licensed or certified, when applicable; and
- (3) has a consistently available contact person, location and telephone number. Access through an answering machine is acceptable."

Services that are available only to members of a certain group or affiliation and organizations that promote or deliver illegal services will not be included in the database. Any changes to this Database Inclusion/Exclusion Policy shall be reviewed with the Department.

E. Whether a service provider receives United Way funding is irrelevant to inclusion/exclusion in the database and to the referral process.

F. Once information about an agency and its programs has been entered into the database, assuming that the database inclusion criteria continue to be met, the information shall be updated by UWVT at least annually.

G. Vermont 2-1-1 I&R services shall be provided by trained I&R specialists who will provide enough information about organizations capable of meeting the identified needs of each inquirer to help the inquirer make an informed choice.

H. Vermont 2-1-1 I&R specialists shall not give advice or make recommendations. I&R specialists may suggest ways the inquirer can advocate for him or herself, when appropriate.

I. I&R specialists shall inform an inquirer about the availability of services to meet his or her needs. I&R Specialists shall not make

recommendations of one particular service provider or program over another, shall not direct the inquirer to a particular service to call first, and shall not talk about any perceived efficacy or quality of benefits or services. I&R specialists shall neither praise nor disparage the services about which information is provided, even if they have personal knowledge or opinions about those services. I&R specialists shall support callers to decide which service to call first by talking with inquirers about their most pressing needs and helping them to identify their priorities based on their own value system.

J. When Vermont 2-1-1 receives a call from a person in crisis, it shall comply with *AIRS Standards* Section I, Standard 2, Criteria 4, which requires I&R services that do not provide a formal crisis intervention service to connect the caller "by prearranged protocols and, if feasible, direct telephone transfer, to an appropriate agency that does. A formal [memorandum of understanding or agreement] shall be in place." Prior to the start-up date, UWVT shall establish transfer protocols and formal agreements with appropriate agencies in Vermont about procedures and policies for handling crisis calls such as domestic violence, mental health and substance abuse emergencies, child abuse, and youth crisis. UWVT shall file on-going status reports with the Department of Public Service on its communications with other organizations and such memoranda of understanding or agreements, as appropriate.

K. UWVT shall consult with law enforcement and other appropriate agencies to get a shared understanding regarding UWVT's duty to report possible criminal conduct or endangerment to law enforcement agencies or social services agencies, if applicable.

L. The external organization with which UWVT contracts to provide after hours coverage must operate in accordance with *AIRS Standards*.

M. UWVT shall add a statement on the 2-1-1 homepage that clearly states that organizations in the database are not limited to organizations funded by individual United Ways in Vermont. UWVT shall also communicate to service

agencies through the request for agency/program information that funding from the local United Way is not required to be included in the 2-1-1 service.

N. UWVT shall not abandon service without the consent of the Public Service Board.

O. UWVT will operate 2-1-1 service at a minimum of 40 hours per week. If UWVT's operations fall below this level, the Department of Public Service may seek an investigation or revocation of UWVT's designation by the Public Service Board as the 2-1-1 service manager.

P. UWVT shall file an annual report with the Public Service Board and the Department of Public Service on or before April 15 of each year summarizing its activity for the past year and its business plan and funding outlook for the coming year.

Dated at Montpelier, Vermont, this 19th day of November, 2004.

<u>s/Michael H. Dworkin</u>)	PUBLIC SERVICE
)	
<u>s/David C. Coen</u>)	BOARD
)	
<u>s/John D. Burke</u>)	OF VERMONT

OFFICE OF THE CLERK

FILED: November 19, 2004

ATTEST: s/Susan M. Hudson
Clerk of the Board

NOTICE TO READERS: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Board (by e-mail, telephone or in writing) of any apparent errors, in order that any necessary corrections may be made.

Appeal of this decision to the Supreme Court of Vermont must be filed with the Clerk of the Board within thirty days. Appeal will not stay the effect of this Order, absent further Order by this Board or appropriate action by the Supreme Court of Vermont. Motions for reconsideration or stay, if any, must be filed with the Clerk of the Board within ten days of the date of this decision and order.